



**ST HELENS**  
BOROUGH COUNCIL

# **ST HELENS BOROUGH LOCAL PLAN 2020-2035**

**COPIES OF REGULATION 20  
REPRESENTATIONS (REGULATION 22 (1) (D))  
DOCUMENT**

**REPRESENTATION ORDER**

**RO1301 – RO1400**

**SEPTEMBER 2020**



RO1301



**Representor Details**

Web Reference Number	WF0108
Type of Submission	Web submission
Full Name	MR DEREK NEVIN
Organisation	
Address	64 CROXTETH DRIVE RAINFORD SAINT HELENS WA118LA WA118LA
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	St helens Borough local plan 2020-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:****6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

There are no exceptional circumstances to justify not using the standard method to calculate housing need

- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been



excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

**7. Please set out modification(s) you consider are necessary**

There is no need to build on grade one arable land when the projected figures for the population of the Borough are on the decline. The housing you plan to build will not help first time buyers as they are far too expensive in the Rainford area, You have many brown field sites and disused properties in St Helens that should be considered first. The infrastructure roads, med centres, schools can not sustain the extra populous it is struggling as it is. there is also the problem with flooding in the area you ear marked to have houses surely concreting more fields and drainage would cause another of the road that took the council 2 years to repair you need to think about your seriously flawed plan and confine it to the file B1n where it belongs

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 10:09:26 AM
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RO1302



**Representor Details**

Web Reference Number	WF0097
Type of Submission	Web submission
Full Name	Mr R Nevitt
Organisation	
Address	12 Ribble Ave Rainhill L35 0NJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	St.Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The physical roadway infrastructure does not currently cope with the demands of the traffic volumes.

The school places are in demand and cannot cope with predicted numbers.

The NHS Medical services are overstretched.

The increase in population will by definition increase the likelihood of vandalism, anti-social behaviour which the Police and emergency services cannot currently cope.

Local wildlife would be greatly impacted due to the loss of yet more green space.

The local population would be adversely affected by the continued growth of urbanisation. This increase will without doubt lead to an increase in pollution, which in turn will lead to increased demand on NHS services due to ill-health.

**7. Please set out modification(s) you consider are necessary****8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 12:04:10 PM
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RO1303



12 MAR 2019

451

Ref: LPSD

(For official use only)



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>CYNTHIA</u> <u>M.</u>	First name: _____
Last Name: <u>NEWCOMBE</u>	Last Name: _____
Organisation/company: <u>—</u>	Organisation/company: _____
Address: <u>115 HIGHER LANE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>ST. HELENS.</u>	_____
Postcode: <u>WA11 8BP</u>	Postcode: _____
Tel No: <u>—</u>	Tel No: _____
Mobile No: <u>—</u>	Mobile No: _____
Email: <u>—</u>	Email: _____

Signature: _____	Date: <u>10.3.19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



115. Highes Lane.

Rainford.

St Helens.

WA 11 830.

9. 3. 19

Local Plan St. Helens Council.  
Town Hall.  
Victoria Square

Dear Sir,

After visiting the coop in Centre in Rainford on 28th Feb. I am writing to object to the proposed building of houses, bungalows & industrial development on the land bounding Rookery Lane & Highes Lane.

This is A1 Agricultural land where food coops are grown each year. The government are asking for more coops to be grown but how can this happen if land can be taken away for housing etc?

Rainford is not equipped for more houses etc to be built. Already there are insufficient doctors, dentists, schools etc to cope with the number of people living here. The roads are congested especially at peak times & the alterations at Windle lights will not automatically resolve this. The bus services have been reduced which makes car travel more necessary.



The facilities in Rainford have been reduced over the years — the recycling centre closed down & the fire station also & the police station has been reduced. Parking is also difficult which will be made worse with more cars in the village.

Air & traffic pollution will be made worse & the wild life will also suffer.

Rainford has always been an agricultural village & should remain so. I appreciate that people need to have somewhere to live, but I am sure there are plenty of empty properties & brown field sites available in the area.

I hope that all these points will be noted.

Yours sincerely,

[Redacted signature]

—



RO1304



12 MAR 2019

Ref: LPSD

(For official use only)

St. Helens  
Council

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## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>FRANCES</u>	First name: _____
Last Name: <u>NEWTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>45 Rookery Lane,</u> <u>Rainford, St Helens,</u> <u>Mercyside</u>	Address: _____
Postcode: <u>WA11 8EG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>9/3/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

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WA10 1HP**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
ALL	object		object		object		unsustainable	object
Other documents (please name document and relevant part/section)				LPS 2 8 HA land South of Higherhams and east of Rookery Lane Rainford				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/> It is Not
Justified?	<input checked="" type="checkbox"/> It is Not
Effective?	<input checked="" type="checkbox"/> It is Not
Consistent with National Policy?	<input checked="" type="checkbox"/> This site grade 1 agricultural land providing employment and food

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>① This land is ploughed, planted &amp; harvested each year, bringing employment and fresh produce to the North West.</p> <p>② 259 Houses will bring at least 350 cars into an area that is already very busy esp. morning and evening. A fleet of buses travel morning &amp; early evening bringing children to Rainford High School, their entrance &amp; exit route is Rookery Lane, which has a blind bend at the bottom. Flooding also occurs here, causing high cast iron grids to rise above road surface. The increased pollution, from which all residents will suffer.</p> <p>③ Local Des and Health Centre are at full capacity. Queues for Dr's appointment.</p>	



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I would suggest, that the many 'Brown sites' in the area be built on; before our precious green belt is gone forever.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

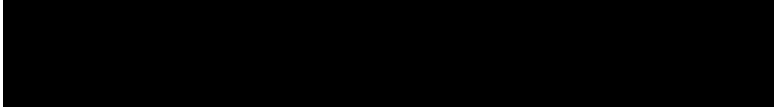
**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





LPSD Ref:8HA land south of higher lane and east of Rookery Lane Rainford.N  
 fran newton  
 to:  
 planningpolicy  
 11/03/2019 16:54



I object to the above proposal to build 259 homes on this Grade 1 agricultural land, which is ploughed, planted and harvested each year providing employment and fresh produce for the North West. 259 homes will mean at least 350 cars into an area that is already very busy each morning and evening. A fleet of double decker buses bring in children to Rainford High School their entrance and exit route is Rookery Lane which has a blind bend at the bottom, over the years there have been a number of head on collisions, extra traffic, i.e heavy vehicles will add to the danger. Flooding also on Rookery Lane, has lifted heavy cast iron water main lids up onto the road.

Local Doctor's, Rainford Health Centre and Schools are at full capacity at the present time, where on earth will a possible 2,000 people go?



RO1305



459

12 MAR 2019

Ref: LPSD

(For official use only)



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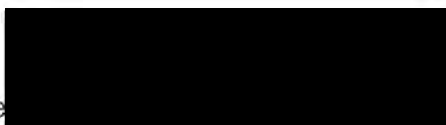
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ELAINE NEWTON</u>	First name: _____
Last Name: <u>NEWTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24, AVERY RD</u>	Address: _____
<u>AVERY PARK</u>	_____
<u>HAYDOCK MERSEYSIDE</u>	_____
Postcode: <u>WA11 0XA</u>	Postcode: _____
Tel: 	Tel No: _____
M: _____	Mobile No: _____
Email: _____	Email: _____

Signature 

Date: 9/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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**Now please complete PART B of this form,  
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**Please use a separate copy of Part B  
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## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	DONT KNOW.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- a) Housing in this area would create even more traffic congestion throughout HAYDOCK, WHICH HAS BECOME A SERIOUS PROBLEM. FOR ALL.
- b) ONCE THE WAREHOUSING ALONGSIDE THIS SITE IS FUNCTIONAL. THE ESTIMATED CONSTANT FLOW OF TRAFFIC DAY AND NIGHT IS GOING TO HAVE MORE CONGESTION EFFECT THROUGHOUT HAYDOCK.
- c) MORE HOUSING, WOULD WARRANT MORE SCHOOLS, DRS SURGERYS, WHICH THERE IS NO FUNDING, ALREADY STRETCHED TO CAPACITY AND BEYOND.
- d) HOW ARE OUR SERVICES TO COPE - POLICE - FIRE SERVICES, AMBULANCE AND REFUSE COLLECTION. CONGESTION IN TRAFFIC COULD COST LIVES IN EMERGENCIES. (FIRE + AMBULANCE SERVICE).
- e) NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.
- f) ST. HELENS POPULATION HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?
- g) HAYDOCK HAS NARROW ROADS THROUGHOUT AND THE INCREASED TRAFFIC BECOMES A REAL DANGER TO ALL.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE  
"GREENBELT".  
TO PREVENT ALL REASONS AT NO 6 THE  
ONLY MODIFICATION IS TO LEAVE "GREENBELT"  
AS "GREENBELT" AND CONSIDER ALL RESIDENTS  
ALREADY RESIDING IN HAYDOCK.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1306





St. Helens  
Council

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>CHRISTOPHER</u>	First name: _____
Last Name: <u>NEWTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>45 DOCKERY LANE</u> <u>RAINFORD</u>	Address: _____
Postcode: <u>WA11 8EG</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobil: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____
Signature: [REDACTED] Date: <u>9.3.19</u>	

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**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



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Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

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## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	OBJECTION	Paragraph/ diagram table	OBJECTION	Policies Map	OBJECTION	Sustainability Appraisal/ Strategic Environmental Assessment	UNSATISFACTORY	Habitats Regulations Assessment	TOO MANY HOUSES FOR A SMALL VILLAGE
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/> No NEED TO TAKE AWAY VALUABLE
Justified?	<input checked="" type="checkbox"/> LAND WHICH IS USED FOR FOOD CHAIN
Effective?	<input checked="" type="checkbox"/> SAVING GREEN BELT FOR
Consistent with National Policy?	<input checked="" type="checkbox"/> FUTURE GENERATIONS

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The reasons given above justify that no houses will benefit future generations. After BREXIT THERE WILL BE A greater need for a sound agricultural policy to feed the people. There will be a great shortage of school places and Medical centres to treat the sick. There will be an estimated increase of 200-300 Cars without any access to roads. The field also floods.</p>

Please continue on a separate sheet if necessary




**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

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**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

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RO1307





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This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANN</u>	First name: _____
Last Name: <u>NEWTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>40 blackbrook Rd</u>	Address: _____
<u>BLACKBROOK ST. HELENS</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA11 9PU</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>12-3-19</u>
------------------	----------------------

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**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

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**Please use a separate copy of Part B  
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## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Building in this area will be detrimental to the environment. Windle Island is a very busy road junction and further building would increase the traffic flow. Further pressure would be put on local schools, hospitals etc., which are under great pressure already. I am a keen ramble and building here would restrict my using the area to walk, bird watch and absorb the rest of what nature has to offer. Therefore, I strongly object to using this land to build on.



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

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**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

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**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1308



**Representor Details**

Web Reference Number	WF0228
Type of Submission	Web submission
Full Name	Mr George Newton
Organisation	
Address	24 Avery Road Haydock St Helens Merseyside WA11 0XA
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05-Site2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Increased housing in this area is unsustainable because of the lack of services, school places, doctors, fire, police and council i.e. bin collection and road repairs.

Population has declined since 1981, why is more housing required?.

All brownfield sites must be exhausted first and empty property's brought back into use, as well converting all un-used space over shops before considering greenbelt land for building.

Roads throughout Haydock and the surrounding area are narrow and unfit for the large number of vehicles that the new housing proposals will generate, this will present an increased danger to pedestrians and road users alike and lead to an increase in accidents.

**7. Please set out modification(s) you consider are necessary**

Delete the land from the proposed removal from the greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 9:09:53 AM
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RO1309





St. Helens  
Council

① LPA05 ③ GEN  
② LPA06 ④ IDP

PFO274

297

Ref: LPSD

06 MAR 2019

(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: RONALD

Last Name: NICKSON

Organisation/company: \_\_\_\_\_

Address: 40 PINFOLD DRIVE

ECCELESTON

ST HELENS

Postcode: WA10 5AT

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 2.3.2019

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☐ Yes (via email)

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Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The Plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The Plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Plan does not satisfy:

- The requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increased dependency from transport hubs. (3)
- sustainable housing targets proposed are based on aspirational employment growth predictions (1)
- Effective land use by concentrating on green space development over town centre development with higher densities (3)
- Food security by ignoring agricultural land quality. See separate sheet.

Please continue on a separate sheet if necessary



Supplementary Sheet for Item 6.

- The housing need of 486 pa is aspirational and driven by economic growth forecasts which are flawed and over optimistic. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet housing needs in St Helens and not the older forecast of 486 (2014) which the council are using.
- The Plan makes no mention of Brownfield and previously developed land which is not yet available or included in the Brownfield Register. The St Helens council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. If these were to be remediated and made available it would completely eliminate the need for the 2 green belt sites of 56.6 ha and 148 ha for housing need.
- The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan or the 25 year safeguarded period being considered.
- The loss of grade 1 and 2 agricultural land is not mentioned. The negative impact on farming and distribution jobs is not considered. It is not sensible to build on productive farmland, especially since after Brexit more agricultural land may be required for food production.
- The Borough has significant and long-term traffic problems as it is, specifically at Windle Island, Bleak Hill Road, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded with the introduction of this plan. There is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm in Haydock. When the Port of Liverpool becomes fully operational with further development at Bickerstaffe and Skelmersdale, this alone will result in an increase in excess of 300 in HGV traffic. It is ludicrous to build 1000 + houses seeking access to the A580. This will create an unacceptable impact on highway safety and the cumulative impacts on the road network will be severe.
- The North West has recently been identified as the most congested area outside of London and St Helens is not meeting its air Quality objectives in several areas in the borough. The increase in traffic proposed will have a significant impact to air quality, noise, tranquillity and general health. The council is promoting less vehicle dependency and yet this plan will exacerbate the situation with edge of town developments.
- If the development of 8HS<sup>315</sup> were to go ahead, there would be insufficient facilities for health care, schools and public transport in the area. The population increase envisaged requires between 10-16 new GPs plus replacements but the IDP does not indicate how they will be provided and funded. The IDP also does not elaborate on how hospitals need to grow to provide a safe service. The schools in the area will be unable to cope. Although Bleak Hill School is being extended to cope with existing demand, it will be unable to cope with the children of 1000 new families. The new medical centre being built at Millfields in Eccleston is built for the existing number of residents in the area and will be inadequate for the vast influx of new residents.

①

③

④

③

②

④

②



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- the areas 845 should be removed from the safeguarded list and returned to Green Belt classification.
- the newer estimate of housing need produced by the ONS(2016) should be used instead of the outdated 2014 figure
- the Plan should ensure that development does not have an unacceptable impact on highway safety or the residual impacts on the road network which will be severe. the Plan does not do this.
- the Plan should include provision for remediating brownfield sites so that green belt land is safeguarded from future development

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

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RO1310





St. Helens  
Council

① - LPA05 ③ - GEN PFO275 (298)  
② - LPA06 ④ - IDP

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

06 MAR 2019

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Title: MRS

First Name: BRENDA

Last Name: NICKSON

Organisation/company: .....

Address: 40 PINFOLD DRIVE

ECCELESTON

ST HELENS

Postcode: WA10 5BT

### 2. Your Agent's Details (if applicable)

Title: .....

First name: .....

Last Name: .....

Organisation/company: .....

Address: .....

Postcode: .....

Tel No: .....

Mobile No: .....

Email: .....

Signature: .....

Date: 2.3.2019

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Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Plan does not satisfy . . .

- the requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increased car dependency from transport hubs.
- sustainable housing targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on green space development over town centre development with higher densities
- food security by ignoring agricultural land quality.

See separate sheet

Please continue on a separate sheet if necessary



Supplementary Sheet for Item 6.

- The housing need of 486 pa is aspirational and driven by economic growth forecasts which are flawed and over optimistic. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet housing needs in St Helens and not the older forecast of 486 (2014) which the council are using.
- The Plan makes no mention of Brownfield and previously developed land which is not yet available or included in the Brownfield Register. The St Helens council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. If these were to be remediated and made available it would completely eliminate the need for the 2 green belt sites of 56.6 ha and 148 ha for housing need.
- The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan or the 25 year safeguarded period being considered.
- The loss of grade 1 and 2 agricultural land is not mentioned. The negative impact on farming and distribution jobs is not considered. It is not sensible to build on productive farmland, especially since after Brexit more agricultural land may be required for food production.
- The Borough has significant and long-term traffic problems as it is, specifically at Windle Island, Bleak Hill Road, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded with the introduction of this plan. There is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm in Haydock. When the Port of Liverpool becomes fully operational with further development at Bickerstaffe and Skelmersdale, this alone will result in an increase in excess of 300 in HGV traffic. It is ludicrous to build 1000 + houses seeking access to the A580. This will create an unacceptable impact on highway safety and the cumulative impacts on the road network will be severe.
- The North West has recently been identified as the most congested area outside of London and St Helens is not meeting its air Quality objectives in several areas in the borough. The increase in traffic proposed will have a significant impact to air quality, noise, tranquillity and general health. The council is promoting less vehicle dependency and yet this plan will exacerbate the situation with edge of town developments.
- If the development of 8HS<sup>3,4,5</sup> were to go ahead, there would be insufficient facilities for health care, schools and public transport in the area. The population increase envisaged requires between 10-16 new GPs plus replacements but the IDP does not indicate how they will be provided and funded. The IDP also does not elaborate on how hospitals need to grow to provide a safe service. The schools in the area will be unable to cope. Although Bleak Hill School is being extended to cope with existing demand, it will be unable to cope with the children of 1000 new families. The new medical centre being built at Millfields in Eccleston is built for the existing number of residents in the area and will be inadequate for the vast influx of new residents.

①

③

④

③

②

④

②



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The areas ~~S145~~<sup>S145</sup> should be removed from the safeguarded list and returned to Green Belt land.
- The newer estimate of housing need produced by the ONS(2016) should be used instead of the outdated 2014 figure.
- The Plan should ensure that development does not have an unacceptable impact on highway safety or the residual impacts on the road network which will be severe. The Plan does not do this
- The Plan should include provision for remediating brownfield sites so that green belt land is safeguarded from future development.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1311





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSPD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1129

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>Ian</u>	First name: _____
Last Name: <u>Norton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>508 Crown</u> <u>Place Rd.</u>	Address: _____
Postcode: <u>WA9 4UP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/4/19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1312





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: GARETH	First name:
Last Name: NOLAN	Last Name:
Organisation/company:	Organisation/company:
Address: 17 NEWBOLD COURT ST HELENS MERSEYSIDE	Address:
Postcode: WA9 4TE	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

27 APR 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1313





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**.  
Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A – Personal Details**  
**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>Shawn</i>	First name:
Last Name: <i>Nolan</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>442 Garswood Road</i>	Address:
Postcode: <i>WN4 0XJ</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobi: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>11<sup>th</sup> May 2018</i>
-----------------------	---------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes ☒ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on MONDAY 13<sup>TH</sup> MAY 2019 by:

post to:

**Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

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We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy  LPAD 5		Paragraph / diagram / table  (1)		Policies Map  IHA		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>


Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is</p>	



limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Garswood Road/ BILLINGE Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

  
Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission? In addition enable people who are homeless would it better to build social housing? This government stated that they would combat homelessness. Instead they are enabling developers to become rich.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### **3. To which part of the Local Plan does this representation relate?**

Policy		Paragraph / diagram / table	②	Policies Map	1 HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

#### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

#### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

#### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

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**Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?**



Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No, I do not wish to participate at the oral examination**

**Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



RO1314



18 MAR 2019

NSPCC

14.3.19.

To Whom it may concern,

I am writing to state my objections to your proposed building plan in Rainford. I have been unable to obtain your official form.

Mainly I object because grade 1 farmland is precious. The government have stated that by 2050 we need to be producing 60% more food! How will this be possible if we build on this type of farmland. Once it has been built on it is lost to farmers.

Other concerns are also important but I feel secondary to my main concern.

Increased pollution --- already a problem  
Pressure on Roads --- the bypass is already a major problem.

Lack of school places :- increased driving.  
Difficulty getting medical appointments --- there is already a 3-4 week wait for appointments.

I would be grateful if my concerns ~~could~~ be considered with the many others you will have had.

Yours faithfully

Mrs C Nolan  
62 Croxteth Drive  
Rainford  
ST HELENS  
WA11 8LA

NSPCC

C.A. NOLAN (MRS)



RO1315





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Janice	First name:
Last Name: Norman	Last Name:
Organisation/company:	Organisation/company:
Address: Tunstalls farm	Address:
Postcode: WA9 4QJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [Redacted]	Date: [ ]
-----------------------	-----------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

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## **DATA PROTECTION**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1316



13 MAR 2019

Ref: LPSD

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

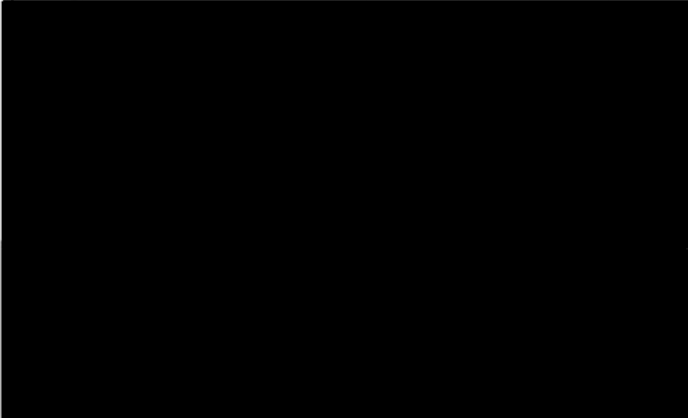
This form has two parts;

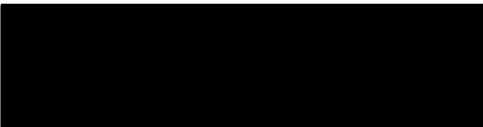
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>Stephen</u>	First name: _____
Last Name: <u>NORTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
	Address: _____
	_____
	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>10/3/18</u>
--	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
✓				✓		✓			✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No The Plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

It does not fulfil the requirement for sustainable development and promotes dependency on the motor vehicle without exploring public transport and congestion issues. Housing targets are not based on sound data and are aspirational based on projected employment figures. The plan targets green spaces over town centre development with higher densities. Increase pollution from traffic. Vital Agricultural land is being wasted. Air quality and retention of already built up network of roads will be affected by increased traffic.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.


Suggest that Brown land be identified and were possible used in place of Green Space Land. The plan targets an already busy congested port of St Helens around Winkfield Island. Suggest consideration be given to moving the development to a more suitable, sustainable location, to an area more suited to radical development - an area already in industrial use; perhaps Haydock where radical development would not impact so much upon residential, established areas. St Helens not enough has been done to identify these areas not only brown land but current industrial areas around St Helens

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1317



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1241  
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>ALAN</u>	First name: _____
Last Name: <u>NUTTAL</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>12 PADDOCK GLOVE</u>	Address: _____
<u>CHOCK FACE</u>	_____
<u>ST. HELENS.</u>	_____
Postcode: <u>WA9 4QP</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: <u>[Redacted]</u>	Date: <u>21.3.19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1318



① - GEN      ② - LPA06

E0010



**Representation Local plan 2020-2035**

Sonia Oakes to: planningpolicy

01/03/2019 14:29



Submitted by: mrs sonia oakes at 11 Padstow drive windle St. Helens wa10 6el. [REDACTED]. I am against the removal of the green belt particularly if the land between the A580, crantock grove, ecclesfield and houghtons lane (now 8HS) and now reclassified as "safeguarded" for development. I consider that the St. Helens borough local plan 2020-2035 is neither justified, effective or consistent with national policy. It is based on flawed methodology as it is based on aspirational employment growth predictions and a housing need using an older forecast (2014) ; it does not comply with NPPF 2018; it makes no mention of brownfield and previously developed land that is not yet available or included in the brownfield register . It is not making use of the existence of brownfield land that already exists and that would satisfy the housing planned by the removal of green belt . The plan is not sound as it doesn't satisfy the requirement for sustainable development and it promotes car dependency . It is not effective because it concentrates on green space development over town centre development with higher densities . Also there are major water pipelines that cut across the 8HS sites that cannot be built on . It would cause further gridlock in the area and delay ambulance services . The NPPF 2018 paragraph 109 states that development should be prevented if there would be an unacceptable impact on highway safety or the residual cumulative impact on the road network will be severe . Pedestrian crossing in the area of windle island is exceedingly difficult and has caused previous fatalities . It is also extremely difficult to turn into St. Helens from bleak hill particularly with other cars attempting to cross in the opposite direction from the petrol station . At the same time reduced bus service in this out of town area require elderly residents and others who do not drive to take taxis - even to get to local health centres and hospitals . The plan does not satisfy food security - particularly at a time when we are planning to leave the EU - by ignoring the country's agricultural needs and building on the agricultural grade 1&2 of 8HS. Once the green belt is lost it is lost for ever and the northwest which is the most congested area outside of London will continue to sprawl and become increasingly polluted creating increasing health and mental problems. The plan would further force people to drive out of the urban sprawl thus again increasing dependence on ownership of cars when the presence of green belt land encourages exercise and promotes well being . On the other hand we would hope that existing brownfield sites would be restored and be used in an attempt towards revitalising depressed areas .

Sent from my iPhone

②

①

②

①



RO1319



Site 8HS

① - General

② - LPA06

③ - LPA05  
12/03/2019 16:23

## Local plan

John Oakes to: planningpolicy

From:

To:

Mr John Oakes, 11 Padstow Drive Windle St Helens Merseyside W10 6EL tel: [REDACTED]  
 [REDACTED] wish to submit my representation against the St. Helens  
 Local plan particularly for the removal of the green belt and specifically  
 for the land known as 8HS between the A580, Crantock grove, Ecclesfield Rd  
 and houghtons lane. I consider the plan not to be sound because it is not  
 justified, effective or consistent with national policy ( NPPF 2018 ) - The ① & ②  
 latter because it promotes unsustainable traffic growth causing exacerbated  
 traffic issues. [REDACTED] the plan's targets are based on older forecasts for  
 example of housing needs ( 2014 ) , and aspirational employment predictions ②  
 [REDACTED] it ignores the need for grade 1 and 2 agricultural land in a future  
 Brexit and the increasing demand for local produce ; it is not justified as  
 there is sufficient brownfield sites within the borough that would satisfy  
 the needs for housing in areas that are better served by public transport  
 and there should be a policy by the LRCA and the council to bring  
 'unsuitable ' sites outside the brownfield register back to use . It is not  
 effective as it concentrates on green space development over town centre  
 development with higher densities . We have already seen how out of centre  
 retail developments has been the death of St. Helens town centres and again  
 how this promotes car dependency . The plan is not in line with sustainable  
 development or the revitalisation of brownfield sites ①

Sent from my iPhone



RO1320





St.Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1102

13 MAY 2019

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: MARGARET

Last Name: OATES

Organisation/company: \_\_\_\_\_

Address: 563 CLOCK FACE RD

ST HELENS

MERSEYSIDE

Postcode: WA9 4UQ

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 23/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1321



**Representor Details**

Web Reference Number	WF0402
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities



**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:27:23 PM
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**Representor Details**

Web Reference Number	WF0404
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:24:45 PM
---------------	----------------------



**Representor Details**

Web Reference Number	WF0405
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:22:11 PM
---------------	----------------------



**Representor Details**

Web Reference Number	WF0406
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing Florida Farm South Policy LPA05 Site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

- The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.



**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:20:20 PM
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RO1322



**Representor Details**

Web Reference Number	WF0407
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities



**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:16:57 PM
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**Representor Details**

Web Reference Number	WF0408
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:14:00 PM
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**Representor Details**

Web Reference Number	WF0409
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:11:21 PM
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**Representor Details**

Web Reference Number	WF0410
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing Florida Farm South Policy LPA05 Site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

- The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.



**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 4:09:04 PM
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RO1323



**Representor Details**

Web Reference Number	WF0411
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

.

Not Justified

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity



There is no statement of common ground with neighbouring authorities

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 3:52:16 PM
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**Representor Details**

Web Reference Number	WF0412
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing on the land at Florida Farm South Policy LPA05 - Site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**



Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 3:33:34 PM
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**Representor Details**

Web Reference Number	WF0413
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing on the land to the south of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 3:22:51 PM
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**Representor Details**

Web Reference Number	WF0414
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan Lancs WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Safeguarded land to the north of Billinge Road Policy LPA06 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 3:14:42 PM
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RO1324



① - LPA04      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0363
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

①

②



**7. Please set out modification(s) you consider are necessary**  
Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:55:50 PM
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① - LPA05    ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0364
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing Florida Farm South Policy LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:54:08 PM
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①-LPA05      ②-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0365
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

①

②

①



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:51:58 PM
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① LPA06 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0366
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:50:14 PM
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① - LPA05 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0367
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:48:39 PM
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① - LPA05      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0368
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Development of Housing Florida Farm South Policy LPA05 Site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/4/2019 3:46:48 PM
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RO1325



1510096



Policy No. LPA05 and LPA06  
Sharon O'Connor  
to:  
'planningpolicy@sthelens.gov.uk'  
12/03/2019 14:23

Sine 8/11/14

① - LPA05

② - DBC

③ - S.A

TO WHOM IT MAY CONCERN

I would like to make my comments of the above policy numbers.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Sue  
Moor

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

①

Kind regards  
SHARON OCONNOR  
12 MILL LANE  
RAINFORD  
ST HELENS  
MERSEYSIDE  
WA11 8LW



RO1326



75

8 Frenchfields Crescent

Bold

St Helens

Merseyside

WA9 4FZ

Dear Sir / Madam,

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

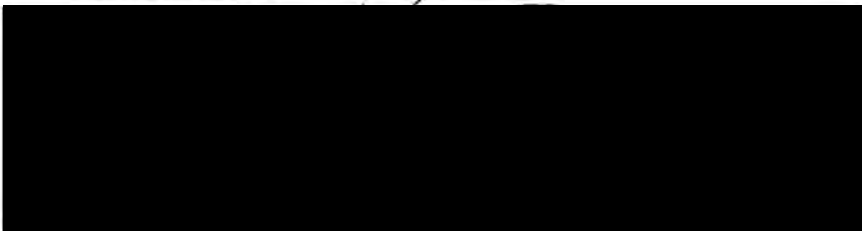
My rationale is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides countryside to the people. It has a huge environmental value. In the face of climate change it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015. Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to many of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA **2988 Houses** and LPSD 5HA **569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,



26 FEB 2019



RO1327





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

24 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>Ellen</u>	First name: _____
Last Name: <u>O'Sonnell</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>8 Samuel Ave</u>	Address: _____
<u>Cashton</u>	_____
<u>Wigan</u>	_____
Postcode: <u>WN4 0YA</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>13/4/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA05</b>		Paragraph / diagram / table		Policies Map	<b>11A</b>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				①					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Not justified—the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

Am:

20A92



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?**



# Please use a separate copy of Part B for each separate comment/representation.

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LA06				IHS			
Other documents (please name document and relevant part/section)				2			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
---

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

2H1

2049.1



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?



Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is accepted, do you consider it necessary to participate at the oral part of the examination? (For hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.



RO1328



**Representor Details**

Web Reference Number	WF0177
Type of Submission	Web submission
Full Name	Mrs Diane O'Donovan
Organisation	
Address	The Cottage Higher Lane Rainford St Helens WA11 8NG
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	All policies
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:****6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

There are brownfield sites available - why, then, is Grade 1 Agricultural land, at present under cultivation, being considered?

**7. Please set out modification(s) you consider are necessary****8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 5:05:12 PM
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RO1329



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019  
1018

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>PAUL</u>	First name: _____
Last Name: <u>ODY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>27 ABBOTS HALL AVE</u> <u>BOLD</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA94UX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	mail: _____

Signature: _____	Date: <u>11/3/19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1330



**Representor Details**

Web Reference Number	WF0132
Type of Submission	Web submission
Full Name	Mrs Mary Ody
Organisation	
Address	27 Abbots Hall Avenue Bold St Helens Wa94ux
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

My view is the same as the Bold and Clock Face action group. I am in agreement with the issues raised.

**7. Please set out modification(s) you consider are necessary**

My view is the same as the Bold and Clock Face action group.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:16:10 PM
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RO1331



**Representor Details**

Web Reference Number	WF0134
Type of Submission	Web submission
Full Name	Mr Harry Ody
Organisation	
Address	27 Abbots Hall Avenue Bold St Helens Wa94ux
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

My view is the same as the Bold and Clock Face action group.

I am in agreement with the issues raised.

**7. Please set out modification(s) you consider are necessary**

Same as the same as the Bold and Clock Face action group.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:13:00 PM
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RO1332



**Representor Details**

Web Reference Number	WF0135
Type of Submission	Web submission
Full Name	Mrs Sadie Ody
Organisation	
Address	27 Abbots Hall Avenue Bold St Helens Wa94ux
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

My views are the same as the Bold and Clock Face action group.

I am in agreement with the issues raised.

**7. Please set out modification(s) you consider are necessary**

No correspondence and no notice given. Other brown land areas should be looked at first. Also protective wildlife on areas identified.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:08:33 PM
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RO1333



**Representor Details**

Web Reference Number	WF0417
Type of Submission	Web submission
Full Name	Master Hayden O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the list of land proposed to be removed from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 2:12:03 PM
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**Representor Details**

Web Reference Number	WF0424
Type of Submission	Web submission
Full Name	Master Hayden O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 12:31:44 PM
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**Representor Details**

Web Reference Number	WF0429
Type of Submission	Web submission
Full Name	Mr Hayden O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

"Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows.

High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities."

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 11:55:20 AM
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RO1334



**Representor Details**

Web Reference Number	WF0418
Type of Submission	Web submission
Full Name	Miss Rebecca O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the list of proposed land to be removed from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 2:09:07 PM
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**Representor Details**

Web Reference Number	WF0425
Type of Submission	Web submission
Full Name	Miss Rebecca O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood WN4 0RH
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from Greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 12:29:04 PM
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**Representor Details**

Web Reference Number	WF0428
Type of Submission	Web submission
Full Name	Miss Rebecca O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

"Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows.

High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities."

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 12:00:30 PM
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RO1335



**Representor Details**

Web Reference Number	WF0419
Type of Submission	Web submission
Full Name	Mr Andrew O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 2:06:30 PM
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**Representor Details**

Web Reference Number	WF0426
Type of Submission	Web submission
Full Name	Mr Andrew O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 12:24:24 PM
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**Representor Details**

Web Reference Number	WF0433
Type of Submission	Web submission
Full Name	Mr Andrew O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 10:29:52 AM
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RO1336



**Representor Details**

Web Reference Number	WF0420
Type of Submission	Web submission
Full Name	Mrs Sarah O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and infrastructure and other services. The development of this land for housing will encourage the use of cars because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 2:03:02 PM
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**Representor Details**

Web Reference Number	WF0427
Type of Submission	Web submission
Full Name	Mrs Sarah O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from ?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination



**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 12:19:08 PM
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**Representor Details**

Web Reference Number	WF0434
Type of Submission	Web submission
Full Name	Mrs Sarah O'Grady
Organisation	NA
Address	35 Elgin Avenue Garswood wn4 0rh
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06 - Site 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/28/2019 10:21:38 AM
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RO1337



**Representor Details**

Web Reference Number	WF0024
Type of Submission	Web submission
Full Name	Mr Daniel O'Hagan
Organisation	
Address	46 Forest Grove Eccleston Park Prescot Merseyside L342RZ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1 The road infrastructure in the area is not capable of sustaining an additional housing development.

a) The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.

b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity

c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.

2. The additional traffic due to the extra houses will have adverse health and safety implications

a) Increased risk to motorists and pedestrians including children from traffic accidents

b) increased risk to health of pedestrians including children due to traffic pollution

3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched

4. There are negative impacts on the environment

a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook

b) Many species of plant and animal life would be eliminated from the area

5) It is not clear that there is a demand for the additional houses proposed



6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.

7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained, and if the green belt remains it can be used for either golf or walking.

**7. Please set out modification(s) you consider are necessary**

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/19/2019 11:53:39 AM
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RO1338



**Representor Details**

Web Reference Number	WF0057
Type of Submission	Web submission
Full Name	Mrs Patricia O'Hagan
Organisation	
Address	46 Forest Grove Eccleston Park Prescot Merseyside L342RZ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1 The road infrastructure in the area is not capable of sustaining an additional housing development.

a) The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.

b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity

c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.

2. The additional traffic due to the extra houses will have adverse health and safety implications

a) Increased risk to motorists and pedestrians including children from traffic accidents

b) increased risk to health of pedestrians including children due to traffic pollution

3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched

4. There are negative impacts on the environment

a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook

b) Many species of plant and animal life would be eliminated from the area

5) It is not clear that there is a demand for the additional houses proposed



6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.

7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained, and if the green belt remains it can be used for either golf or walking.

**7. Please set out modification(s) you consider are necessary**

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 3:04:57 PM
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RO1339



**Representor Details**

Web Reference Number	WF0058
Type of Submission	Web submission
Full Name	Mr Bernard O'Hagan
Organisation	
Address	46 Forest Grove Eccleston Park Prescot Merseyside L342RZ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HF
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1 The road infrastructure in the area is not capable of sustaining an additional housing development.

a) The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.

b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity

c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.

2. The additional traffic due to the extra houses will have adverse health and safety implications

a) Increased risk to motorists and pedestrians including children from traffic accidents

b) increased risk to health of pedestrians including children due to traffic pollution

3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched

4. There are negative impacts on the environment

a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook

b) Many species of plant and animal life would be eliminated from the area

5) It is not clear that there is a demand for the additional houses proposed



6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.

7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained and if the green belt remains it can be used for either golf or walking.

**7. Please set out modification(s) you consider are necessary**

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 2:51:36 PM
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RO1340



WF004  
SITES 4HA, 5HA & 6HS  
① - LPA05  
② - LPA06

#### Representor Details

Web Reference Number	WF0004
Type of Submission	Web submission
Full Name	Councillor David O'Keefe
Organisation	
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT WA9 4DT
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

#### 3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

#### 5. If you consider the Local Plan is unsound, it because it is not:

Consistent with national policy

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council has not provided special circumstances to justify green belt release. There is enough brownfield Land for a minimum of 6,000 houses in the borough.

The council has opted for a policy of Green belt release first. They have neglected the opportunities afforded by brownfield sites to provide housing. This is in breach of the National Planning Policy framework Chapter 11 paragraphs 136, 137 and 138.

I want 4HA and 5HA removed from the Local Plan. Also the safeguarded site 6HS.

SUGGESTED MODS

#### 7. Please set out modification(s) you consider are necessary

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

#### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:



RO1341





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Richard</u>	First name: _____
Last Name: <u>OLIVER</u>	Last Name: _____
Organisation/company: <u>/</u>	Organisation/company: _____
Address: <u>33 VICTORIA ROAD,</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WA4 6TA</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>20/02/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA 06 HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - The council should be put to strict proof of its population estimates            One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land - Using greenbelt fails to do this.            The release of greenbelt will cause significant harm to the purposes of the greenbelt.            Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services.            The use of cars is being encouraged because of the lack of local facilities.            there is no statement of common ground with neighboring authorities</p>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



119

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019  
(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Richard</u>	First name: _____
Last Name: <u>OLIVER</u>	Last Name: _____
Organisation/company: <u>/</u>	Organisation/company: _____
Address: <u>33 VICTORIA ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0TA</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>20/02/19</u>
------------------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy <b>LPAOS</b> <b>1HA</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are the people coming from?</p> <p>One of the purposes of Greenbelt is to assist in urban regeneration by encouraging the use of derelict and other urban land. Using greenbelt fails to encourage this.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Green belt.</p> <p>Housing in the area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>The access to the site on either Billinge Road or Garwood Road would be inadequate. Any necessary highway <del>works</del> <sup>works</sup> must be funded by the developer and not council tax payers</p> <p style="text-align: right;">Please continue on a separate sheet if necessary</p>



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1342



Ref: LPSD

28 FEB 2019

(For official use only)

St Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: MARTIN NEWMAN

Last Name: OLLEY

Organisation/company: \_\_\_\_\_

Address: 19 VICARAGE DRIVE  
HAYDOCK

Postcode: WALL OUG

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 26.2.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

VIEW A



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## FURTHER INFORMATION

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

① I HAVE READ THE GUIDANCE NOTES AND FAQs AND THE SECTIONS ON THIS FORM (6+7) AND HAVE NEVER READ SO MUCH LEGAL AND CONFUSING JARGON IN MY LIFE. I WROTE TO THE COUNCIL ON 5 FEB AND THAT LETTER INCLUDES OBJECTIONS TO THE PROPOSAL FOR ROWING IN AREA HA3. QUITE SIMPLY THE ADDITION OF GOD KNOWS HOW MANY HOUSES, FOLLOWING ON FROM THE HUGE WAREHOUSES BEING BUILT IN EA2, WILL ADD YET MORE UNACCEPTABLE POLLUTION, NOISE AND ROAD TRANSPORT TO A SYSTEM ALREADY GROSSLY OVERLOADED AND CONGESTED. IT TAKES NO ACCOUNT OF THE QUALITY OF LIFE OF EXISTING ~~RES~~ RESIDENTS IN THE AREA, NOR DOES → ②

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

IT TAKE INTO ACCOUNT THE LOSS OF VALUABLE GREENBELT (AMENITY/ WILD LIFE / "ROOM TO BREATHE." WHERE IS ALL THIS BUILDING GOING TO END? MY MAIN OBJECTION IS THE LOSS OF SO MUCH OPENSPACE IN SUCH A SHORT PERIOD OF TIME — DON'T FORGET THE HUGE WAREHOUSES YOU HAVE BLANDLY AGREED TO IN AREAS EA2/EA6/EA7 WHICH WILL BLIGHT THOUSANDS OF PEOPLE'S LIVES FOR EVER. PLEASE READ THIS IN CONJUNCTION WITH MY LETTER OF 5 FEBRUARY — ASSUMING YOU HAVE NOT ALREADY BINNED IT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**







HAVE ALREADY AGREED FOR THE RELEASE OF AREA 2HA FOR HOUSE BUILDING BEFORE PERUSAL OF THE 2020-2035 PLAN, AND BEFORE ANY PUBLIC CONSULTATION. I WOULD BE DELIGHTED IF YOU WERE TO TELL ME I HAD GOT IT WRONG. YOU REALLY ARE A DEVIOUS BUNCH.

WHEN THAT AREA IS RELEASED (AND I AM SURE IT WILL BE, DESPITE WHAT LOCAL RESIDENTS THINK), THEN I HOPE THE HOUSE BUILDING IS DONE SYMPATHETICALLY AS THE CLIPSLEY BROOK AND VALLEY IS A HAVEN FOR WILD LIFE AND BIRDS.

FINALLY, A REQUEST. THE WASTE LAND OPPOSITE THE HOUSES ON BROOKSIDE VIEW IS DISGUSTING, WITH YEARS OF LITTER (TIN CANS & PLASTIC BOTTLES) MAKING THE WHOLE AVENUE VERY UNTIDY. I REFER PARTICULARLY TO THE LAND (THE PARTS WHICH DON'T HAVE GARAGES BUILT ON THEM) AT THE WEST END FROM THE TOP OF GROSVENOR ROAD. I WOULD LIKE THE COUNCIL TO ARRANGE TO HAVE IT CLEANED UP PLEASE. IF THE COUNCIL SAYS IT DOESN'T KNOW WHO THE LAND BELONGS TO, THEN PLEASE FIND OUT OR WRITE TO THE RESIDENTS OPPOSITE ABOUT THE PROBLEM. YOU HAVE ONE MONTH TO SEE TO IT, FAILING WHICH I WILL TEMPORARILY WITHHOLD MY COUNCIL TAX UNTIL IT IS DONE. PLEASE SAVE US ALL A LOT OF HASSLE, AND JUST DO IT. I RECKON THE ROAD SWEEPER COULD ACCOMPLISH THE TASK IN LESS THAN HALF AN HOUR. (INCIDENTALLY, I HAVE NOT SEEN A ROAD SWEEPER DOWN VICARAGE DRIVE FOR MANY A LONG DAY - JUST WHAT AM I PAYING MY COUNCIL TAX FOR?) IT GOES WITHOUT SAYING THAT MY NAME & ADDRESS ISN'T MENTIONED TO ANYONE.

I KNOW THAT THE COUNCIL DOESN'T USUALLY TROUBLE ITSELF TO REPLY TO ANY CORRESPONDENCE, BUT I DO EXPECT A REPLY TO THIS LETTER, AND TO SOME OF THE POINTS RAISED.

YOURS FAITHFULLY,

  
(MARTIN N. OLLEY)

P.S. RE THE "REGENERATION" OF THE TOWN CENTRE.

I AM AFRAID IT IS TOO LATE. THE DAMAGE THIS GOD DAMN AWFUL COUNCIL HAS DONE TO THE TOWN STARTED WAY BACK IN THE 1970s WITH THE DISASTROUS AND ILL THOUGHT-OUT RE-DEVELOPMENT, WHEN THE OLD MARKET AND MARKET SQUARE WAS DEMOLISHED. YES, IT DID LOOK A BIT TIRED, BUT IT COULD HAVE BEEN SMARTENED UP AND RETAINED AS A FOCAL POINT IN THE TOWN. SINCE THEN YOU HAVE ALLOWED THE DEMOLITION OF THE TWO BEST BUILDINGS IN TOWN (THE FLEECE HOTEL AND THE CO-OP BUILDING), AND REPLACED BY UGLY "MODERN" BUILDINGS, MOST OF WHICH ARE NOW EMPTY! WOOLWORTHS, M & S (SOON), ARGOS, W H SMITH, BURTONS, ETC. ETC. HAVE GONE, SOME TO THE DISASTROUS "RETAIL PARK" AT RAVENHEAD, THUS CREATING MORE & MORE HORRENDOUS TRAFFIC, IN AN AREA WHERE THERE IS LITTLE, IF ANY, PUBLIC TRANSPORT. ALL THOSE STORES SHOULD HAVE STAYED IN TOWN (TO WHERE THERE IS PUBLIC TRANSPORT) TO KEEP IT VIBRANT, AND THE LARGE "RETAIL PARK" AREA SHOULD HAVE BEEN FILLED WITH HOUSES - WHICH IS WHAT YOU KEEP TELLING US WE NEED MORE OF! ALL TOO LATE NOW, I'M AFRAID. THE DAMAGE HAS BEEN DONE AND THERE IS NO GOING BACK. AND ST HELENS IS BY NO MEANS THE ONLY TOWN REDUCED TO A SHELL BY THE CALAMITOUS TOWN & COUNTRY PLANNING DECISIONS OF THE LAST 30-35 YEARS. SO FOR GOD'S SAKE DON'T WASTE MORE MILLIONS REPLACING OLD EMPTY SHOPS WITH NEW EMPTY SHOPS!



RO1343



①-LPA05 ②-IDP

12 MAR 2019

Miss Caroline O'Neile  
72 Norley Drive  
Eccleston  
St Helens  
WA10 5NJ

10<sup>th</sup> March 2019**Reference : St Helens Local Plan 2020-2035**

Dear Sir/Madam,

This representation presents my concerns with the latest version of the St Helens Metropolitan Borough Council (StHMBC) Local Plan 2020-2035, as it contains some questionable elements and does not seem to be justified or consistent with National Policy. My primary concern is for the area designated 8HS, though the following points will apply to most areas within the Local Plan.

**Firstly, LPA05 Meeting Housing Need.**

- Growth numbers are aspirational and not realistic, using older 2014 Office for National Statistics (ONS) figures rather than the latest 2016 ONS figures for growth.
- StHMBC's Brownfield Register suggests land availability for some 5800 houses, whilst Table 4.6 of the Plan calls for about 7200, leaving a need of about 1400 houses. This equates to about 48Ha of land rather than the proposed 288Ha.
- StHMBC states it needs to safeguard land to plan for beyond this 15 year Local Plan, beyond 2035 when so much can change in that timeframe. It seems unnecessary and irresponsible to remove Green Belt protection from land before the end of this proposed Plan, as it might never be required.
- The Plan makes little or no use of Brownfield or Previously Developed Land. StHMBC states 3170Ha of the lowest priority contaminated land exists in the borough which could be remediated and brought back into use. It is unreasonable to assume that such land cannot be made available within the 15 year Plan period. The removal of 443Ha from Green Belt protection when over 3000Ha of Brownfield land exists is not logical and there does not appear to be any exceptional circumstances to justify the removal of Green Belt on this scale.
- The Plan in its current form cannot be justified or deemed to be effective and therefore can't be considered sound.

**Secondly, LPA08 Infrastructure Delivery Plan (IDP).**

- The IDP attempts to address some very aspirational and questionable growth forecasts but seems to lack any detailed substance on what will actually be done to solve the issues that adoption of this Plan will undoubtedly bring.
- The plan proposes unsustainable traffic growth, which will cause severe traffic issues in the exact areas that the Borough already has significant and intractable problems today. This cannot satisfy the NPPF. Whilst the IDP refers to some of these existing issues but it does not detail how these problems will be solved or even funded, with many references to "seeking contributions" and numerous TBCs.



- The IDP does not clearly address Education needs; how these will be funded or managed. Mention is made of expansion plans for one Primary School but that is for current pupil placement issues and doesn't address school places that will be required for over 1000 new homes at site 8HS. The IDP does not deal with the long term impacts of the education needs of new and existing communities. (2)
- Similarly, the IDP does not clearly address Healthcare. Whilst the IDP acknowledges that a high proportion of existing GPs are over 55 and attracting new GPs is a problem, the proposed population increase would require 10-16 new GP's plus replacements for those approaching retirement. The Plan does not elaborate on how these will be funded and provided.
- With the removal of Green Belt land, there will be an irrevocable loss of Grade 1 agricultural farm land, at a time when there may be potential issues of food availability in the short-medium term. The Sustainability Appraisal document even promotes the loss of this Grade 1 agricultural land so as to provide local employment to a new residential development! (1)

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,



Ms C. O'Neile

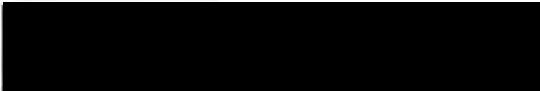


RO1344



12 MAR 2019

3 Ecclesfield Road  
Eccleston  
St Helens  
WA10 5LU

  
9<sup>th</sup> March 2019

**Reference : St Helens Local Plan 2020-2035**

Dear Sir/Madam,

I am writing to object to the St Helens Council Local Plan (2018). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

St Helens Council are using a projected annual house building target of 486, based on the ONS (2014) suggestion of 468 but the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. I do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances".

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development. It is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares pa; enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term.

Protecting food security has to run in parallel with other priorities such as tackling climate and securing a healthy natural environment. These collectively are likely to



be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land parcel referred to as 8HS, south of the A580 adjacent to Windle Island. This land is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable farming land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier. As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB:( Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more;

Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;

Daily average speed will change by 10km/hr or more; and

Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development even though St Helens Council has identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. In developing housing in the past, remediation has been required (examples include the former Providence Hospital site, the Cansfield Street laundry site, Triplex works and the Shires housing development). This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release.

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt.

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. The housing target figures should be reduced; the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours Sincerely,



**B. R. O'Neile**



RO1345



① - LPA05 609 ② - IDP

P10040

12 MAR 2019

Mrs Patricia O'Neile  
3 Ecclesfield Road  
Eccleston  
St Helens  
WA10 5LU

10<sup>th</sup> March 2019

**Reference : St Helens Local Plan 2020-2035**

Dear Sirs,

This representation presents my concerns with the latest version of the St Helens Metropolitan Borough Council (StHMBC) Local Plan 2020-2035, as it contains some questionable elements. Therefore I believe The Plan is not sound; does not seem to be justified or consistent with National Policy. Whilst my primary concern is for the area designated 8HS, the following points will apply to most areas within the Local Plan.

Firstly, LPA05 Meeting Housing Need. The proposed growth numbers appear to be very aspirational and not on a realistic basis, as well as not using the latest 2016 Office for National Statistics (ONS) figures for growth. The use of older 2014 ONS figures suggests StHMBC preferred to use the higher numbers to suit their desire to remove Green Belt land.

StHMBC's own Brownfield Register suggests land availability for some 5800 houses, whilst Table 4.6 of the Plan shows a requirement of about 7200, thereby needing about 1400 houses. This would equate to about 48Ha of land being needed, as opposed to the Table 4.5 proposal of 288Ha of land! Five times as much.

Furthermore, StHMBC states it needs to safeguard land to plan for beyond this 15 year Local Plan, beyond 2035 when so much can change in that timeframe. It seems unnecessary and irresponsible to remove Green Belt protection from land before the end of this proposed Plan, as it might never be required.

The Plan makes little or no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. StHMBC's own statement indicates 3170Ha of the lowest priority contaminated land exists in the borough which could be remediated and brought back into use. It seems that StHMBC has no policy and no desire to bring these sites back into use, yet it is also unreasonable to assume that such land cannot be made available within the 15 year Plan period. To propose the removal of 443Ha from Green Belt protection when over 3000Ha of Brownfield land exists is not logical and there does not appear to be any exceptional circumstances to justify the removal of Green Belt on this scale. The Plan in its current form cannot be justified or deemed to be effective and therefore can't be considered sound.

Secondly, LPA08 Infrastructure Delivery Plan (IDP). The IDP attempts to address some very aspirational and questionable growth forecasts but seems to lack any detailed substance on what will actually be done to solve the issues that adoption of this Plan will undoubtedly bring.



The plan proposes unsustainable traffic growth, which will cause severe traffic issues in the exact areas that the Borough already has significant and intractable problems today. This cannot satisfy the NPPF. Whilst the IDP refers to some of these existing issues but it does not detail how these problems will be solved or even funded, with many references to "seeking contributions" and numerous TBCs.

The IDP does not clearly address Education needs; how these will be funded or managed. Mention is made of expansion plans for one Primary School but that is for current pupil placement issues and doesn't address school places that will be required for over 1000 new homes at site 8HS. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

Similarly, the IDP does not clearly address Healthcare. Whilst the IDP acknowledges that a high proportion of existing GPs are over 55 and attracting new GPs is a problem, the proposed population increase would require 10-16 new GP's plus replacements for those approaching retirement. The Plan does not elaborate on how these will be funded and provided.

With the removal of Green Belt land, there will be an irrevocable loss of Grade 1 agricultural farm land, at a time when there may be potential issues of food availability in the short-medium term. The Sustainability Appraisal document even promotes the loss of this Grade 1 agricultural land so as to provide local employment to a new residential development!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,



Mrs P. O'Neile



RO1346



285)

Ref: LPSD  
05 MAR 2019  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>PETER</u>	First name: .....
Last Name: <u>O'NEILL</u>	Last Name: .....
Organisation/company: <u>/</u>	Organisation/company: .....
Address: <u>111, ALDER HEY RD,</u>	Address: .....
<u>ST. HELENS</u>	.....
Postcode: <u>WA10 4DW</u>	Postcode: .....
[Redacted]	el No: .....
[Redacted]	Mobile No: .....
[Redacted]	mail: .....

Signature: <u>[Redacted]</u>	Date: <u>3.3.19</u>
------------------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



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**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

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We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	LAOS								
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>It doesn't satisfy the requirement for sustainable development.</p> <p>in</p> <ul style="list-style-type: none"> <li>a) transport. Promote increased car usage</li> <li>b) housing</li> <li>c) effective land use. Should develop brownfield sites first.</li> <li>d) Food security. Ignoring Agricultural Land Quality</li> </ul>	



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No mention of Brownfield, and PDL that is not yet included in Brownfield Register.  
 Traffic problems at Windle Island ~~will~~ at Black Hill Road will be exacerbated.  
 The schools and medical centres are already at full stretch and will not be able to cope with increased numbers

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1347



05 MAR 2019

(For official use only)

St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>CHRISTINE</u>	First name: .....
Last Name: <u>O'NEILL</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>111 ALDER HEY RD</u>	Address: .....
<u>ECCLESTON</u>	.....
<u>ST. HELENS</u>	.....
Postcode: <u>WA10 4DW</u>	Postcode: .....
[Redacted]	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: [Redacted]	Date: <u>4/3/2018</u>
-----------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LA05	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> not compliant with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>The proposed Local Plan does not satisfy Sustainable development in a) effective land use b) housing targets c) transport systems d) food security/land quality in agricultural use.</p>

using ONS(2014) statistics when updated ONS(2016) statistics are available.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The Plan makes no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register.
- The Plan fails to explain the impact on Healthcare and Education access to possible new residents. The current situation in these two areas does not even address current demands. There is no mention as to how future expansion would be realistically managed and funded. No references to collaboration with the Education Authority, local CCG's or the Hospital Trust.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1348





St. Helens  
Council

367

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARGARET	First name:
Last Name: O'NEILL	Last Name:
Organisation/company: RESIDENT OF RAINFORD	Organisation/company:
Address: 10 ROSE PLACE RAINFORD STIRLING WAL 8 9 9	Address:
Postcode: WAL 8 9 9	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: —	Mobile No:
Email: —	Email:

Signature: [REDACTED]	Date: 10.3.19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## RETURN DETAILS

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post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or by hand delivery to:** Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or by e-mail to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

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**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each  
separate comment/representation.**











RO1349





St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Jeremy	First name:
Last Name: O'Neill	Last Name:
Organisation/company: Resident	Organisation/company:
Address: 16 Rose place Rainford ST. Helens, Merseyside	Address:
Postcode: WA11 8QG.	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 10.3.19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



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St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or by hand delivery to:** Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

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separate comment/representation.**







making the site waterlogged at the best of times. Flooding is a problem with only recently the brook bursting its banks and flooding the ground the Road at Pasture Lane causing the Road to collapse. Any increase in Surface water would increase the likelihood of this happening again, as ground that originally soaked up Rain water etc at the top of Rocky Lane is converted over, so run off would increase.

③ local Schools are already full so no spare capacity in Infant, Junior and local Schools.

④ no Park facilities at this end of the village, only King George V Park, long abandoned.

⑤ not enough Parking in the village for more people

⑥ G.P Practices are already full, no spare capacity

⑦ The loss of land to the farmer would impact on his viability as a business and put people out of a job not creating jobs etc. Rainford is an

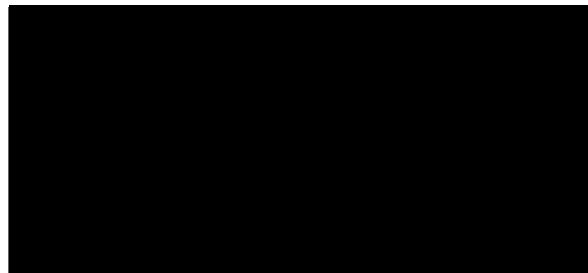


agricultural village, that is its industry.  
growing food for local, etc.  
lossing jobs goes against the local  
plans objectives.

⑧ There is plenty of Brown field land sites  
that St. Helens can build on.

To attract Business  
to St. Helens, the Town needs to be  
landscapped, the Town Centre developed  
to make it attractive to new  
incoming investment. Senior Schools  
need to be improved.

St. Helens as an  
area to relocate ~~to~~ a business to  
is simply unattractive and cannot  
compete with Warrington etc. Building  
on green belt land will not save  
the Town.









RO1350





St.Helens Borough Local Plan 2020-2035 - Group Representation

Adam Onyett

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:35



2 Attachments



St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards

Adam Onyett

- ① - LPA05 - TABLE 4-5
- ② - LPA05 - GEN
- ③ - LPA05 - 6HA
- ④ - LPA06
- ⑤ - LPA02
- ⑥ - LPA06 - 3HS
- ⑦ - TIA
- ⑧ - IDP
- ⑨ - para 1.7.2 - DEC.





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;

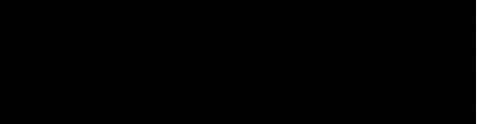
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Adam	First name:
Last Name: Onyett	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 37 Wedgewood Gardens St Helens	Address:
Postcode: WA9 5GA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text" value="10/03/19"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### 3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Unsure	
Sound?		No
Complies with the Duty to Cooperate		No

Please tick as appropriate

#### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the

①

②



recommendation being 482dpa. The 2016 based projections have a proposed figure of 383dpa (see paragraph 8.8 of the GL Hearn report). The Plan does not seem to justify why 486dpa has been determined and for this reason the Plan is not justified. There also appears to be some confusion on the required dpa; item 1. In the table of paragraph 4.16 suggests 486dpa, yet paragraph 4.18.4 suggests the figure is 468dpa. This confusion seems to throw some of the report in to doubt.

The site at Cowley Hill (6HA), is understood to have a potential of more than 1,000 dwellings which could be built on this site; well above the 816 suggested in the Plan. The proposed density (35 units per Ha) is potentially lower than the developer would wish for and certainly the 75% net developable area is below what any developer would propose for such a site. The cost of remediation of such a brownfield site would need a greater land usage and density in order to maximise the economic viability for cost of remediation. It also understood that a potential developer would want to complete the entire site within the 15 year period of the proposed Plan, again due to economic viability. So, the Plan is unsound delivering only 516 dwellings at this site over its period as opposed to the probable 1,000+ dwellings which will happen over the Plan period.

Under section 3.2.1 of the Plan (Strategic Aims & Objectives), within the table under item 6.2 & 6.3 the protection of the environment and enhancement of green space is promoted. Paragraph 4.24.1 offers no real justification against this Aim rendering the proposal not justified nor sound.

Section 4.5 of the Plan states that all strategic aims have been met, however, item 4 of Policy LPA02 releases green belt. This does not meet Strategic Aim item 6 'Safeguarding and Enhancing Quality of Life'.

The Plan does not identify specific measures to deal with the Infrastructure Delivery to be incorporated with the use of the 3HS site, nor is anything specific referred to in the Infrastructure Delivery Plan. The area surrounding 3HS suffers significant congestion throughout the day, specifically between 07:30-09:15, 14:30-16:00 and 17:00-18:30 on weekdays. The arterial route of Warrington Road (A57) is always busy being a main route between M62, Whiston hospital (constantly having ambulances traversing through) and Prescott. The junction of Warrington Road (A57) and Rainhill Road (at Skew Bridge) is a significant 'bottleneck' point on this route and, should there be development of 3HS, would serve to increase congestion issues. There is also pressure on Elton Head Road and where this meets the A570 Linkway. The ongoing roadworks are intended to alleviate this however, it is believed that by changing the roundabout to a traffic signalled junction will not significantly improve the situation.

The traffic congestion concerns also lead the local community to concerns regarding our health. Contained within the Plan in paragraph 2.6.1 are the leading causes of death within our Borough. These are cancer and respiratory disease which can both be brought on by poor air quality. By the introduction of 3HS in the Plan, a significant green space, the local residents have genuine fear for our health with the introduction of at least 1,000 cars for any development on 3HS (not accounting for the added pollution throughout the construction phase). Coupled with the risk to health from congestion is the loss of trees from the 3HS site in which helps to offset some of the CO2 emissions.

The Transport Impact Assessment 2019 makes no reference to the 3HS site and has taken no account of the potential traffic increase from this site (or any of the other proposed 'safeguarded' sites) so, therefore, proves the Plan is not sound. As described above, the traffic situation is currently at breaking point and without a clear transport strategy considering the impacts of the 3HS site the proposals will have a detrimental effect on the road users within the wider area.

2

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Highway  
& Warrington

6

7

3HS

For mean

1498

Confidentiality



The Infrastructure Delivery Plan also identifies the need for increased capacity for health care, emergency services, education and community services (leisure, libraries, etc.). Again, there appear to be no specific plans and we know that SHMBC support for community services has declined over the past decade. There does not appear to be any capacity within the local schools to support an increase in the magnitude of likely school places required by the development of the proposed 3HS site. The Infrastructure Delivery Plan **must** identify potential solutions to these issues before the 'safeguarding' of 3HS should be proposed. We cannot accept the confirmation of future development without a feasible plan in place to deal with the effects of such a population increase.

The healthcare system in the Borough is stretched and, again, there is deep concern regarding this especially coupled with the aspiration of increased life expectancy and the need to support an ageing population. We are fully aware of the NHS plans to commence a phased closing of the Accident & Emergency department at Whiston Hospital and are gravely concerned about the emergency healthcare, not only to the immediate area of 3HS, but also the entire borough. Sharing an A&E which is over 10miles (Liverpool Royal) is not feasible.

The current situation with doctors and dental surgeries is not sustainable with no registration available within a 5 miles radius of the 3HS site. Should development of this area be permitted, then the situation will worsen. School places are also currently over subscribed, with the local Primary and Secondary Schools have little chance of accommodating any further residents brought about by proposed new development. 'Bulge' classrooms, as referred in the Infrastructure Delivery Plan, will not offer a long term solution to this issue and are temporarily offering respite to over an already over subscribed area. These are primary concerns of all local residents, with the Infrastructure Delivery Plan offering no solution whatsoever. For this reason, the Plan is not justified.

The area surrounding 3HS is significantly developed and, should there be development on this site, there would be a continuation of urban development without any significant green space separation; joining the areas of Whiston, Portico, Thatto Heath, Rainhill and Nutgrove into one continuous sprawl.

There is no evidence of collaboration with neighbouring authorities to 'join up' proposals and, with specific consideration of traffic congestion, we envisage significant increase in congestion on the roads surrounding 3HS and access to M62 through the current development at Scotchbarn Lane and the proposed Halsnead Garden Village, which will inevitably increase the traffic around Rainhill; specifically, A57 and M62 Junction 7, which will have a knock on effect around the already congested 3HS site. The concerns regarding further loss of green belt land in the neighbouring authorities reinforces the need to retain the 3HS site as green belt and decrease the current urban sprawl across the Liverpool City Region and into neighbouring Cheshire. In effect, by seeing the development of Halsnead Garden Village and allowing 3HS to be 'safeguarded' is allowing Liverpool City to sprawl into a larger conurbation.

There does not appear to be an ecological report/survey to support the Local Plan, specifically identifying protected species. Having lived, walked and spent time around the 3HS site, we believe that there are protected species present. Owls can often be heard tooting at night, newts have been seen by some and it has been suggested that even Peregrine Falcons have previously nested on this site. The site has a variety of flora and fauna, offering precious habitat to support wildlife. LPC06 makes suggestions regarding mitigation should the benefits of development outweigh any harm to nature conservation. We do not believe that, should development be permitted following the 'safeguarding' of site 3HS, there is any potential to mitigate the wide open spaces that these precious species require. In the absence of a

8  
109

6

6

-9  
Dec  
para  
1-7-2

6



supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



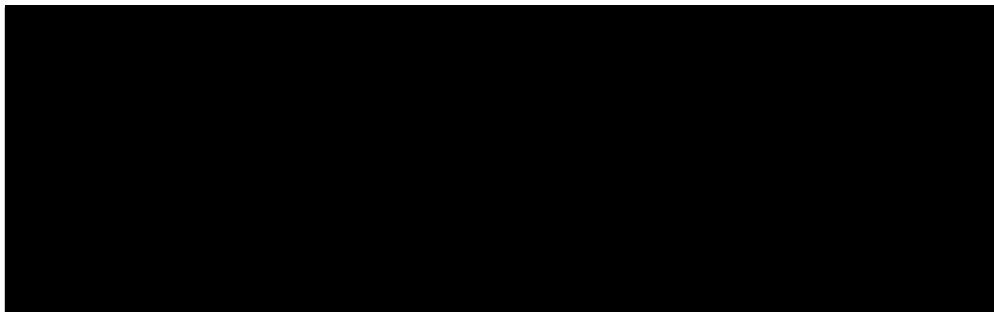
**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



I give explicit permission for my name to be included in the Representation with the lead name of Adam Onyett regarding the St Helens Local Plan and confirm that we have worked together on this response.

DEEP MATHUR



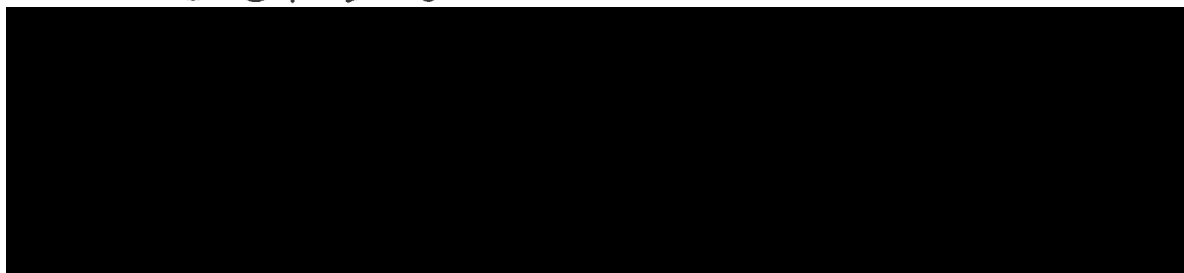
Name: ROBERT CRAWFORD



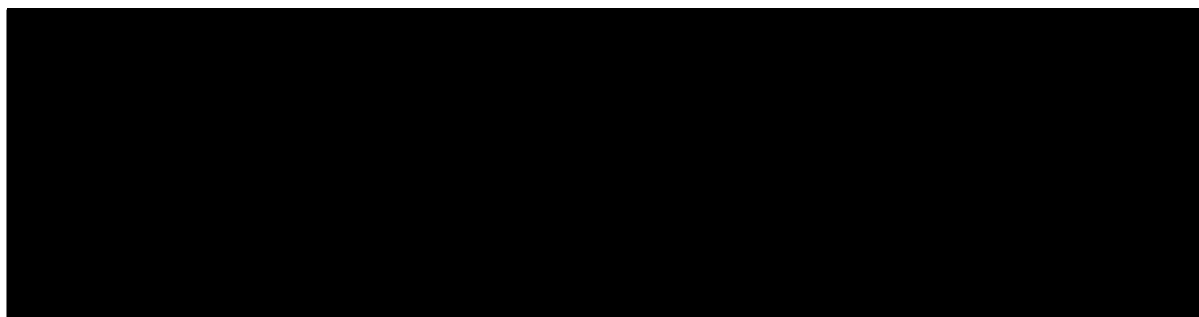
Name: M. HAMPSON



Name: B BILLOWS + J BILLOWS



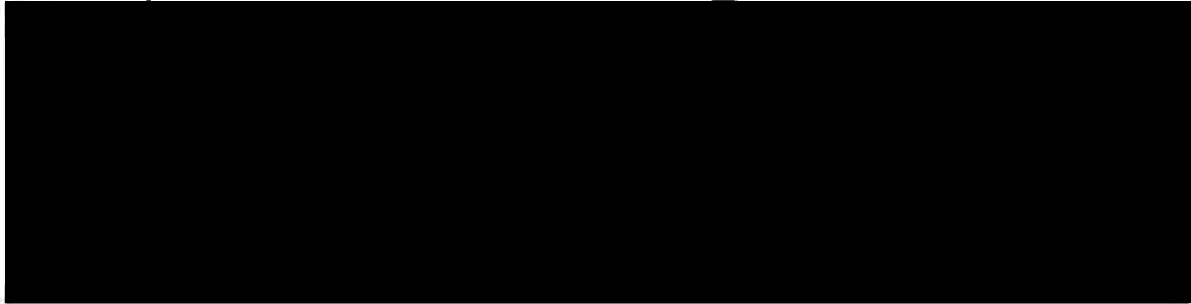
Name: S. ROBINSON



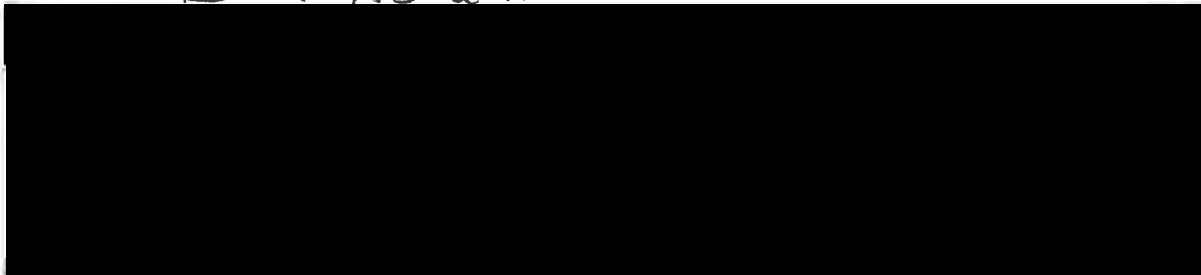


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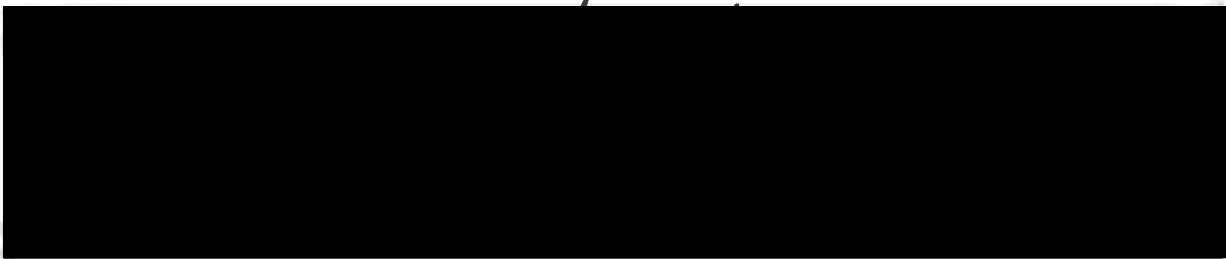
Name: AHMED ABD EL GAWAD



Name: Dina Abdel Aal



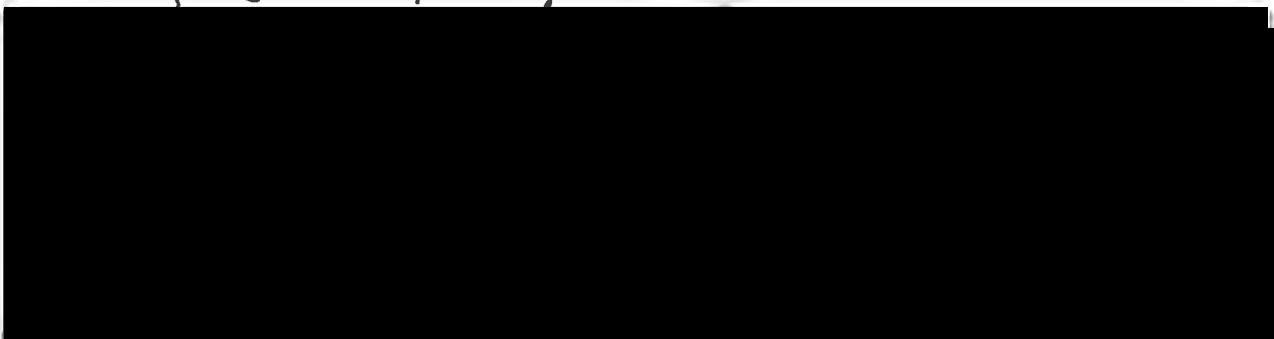
Name: Nour Abdel Gawad



Name: Belal Abdel Gawad



Name: Fatma Abdel GAWAD





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Name: Dr. Mohammad Al-Jubouri

Name: Mrs. Shilan Jamil

Name: Nicola O'Keeffe

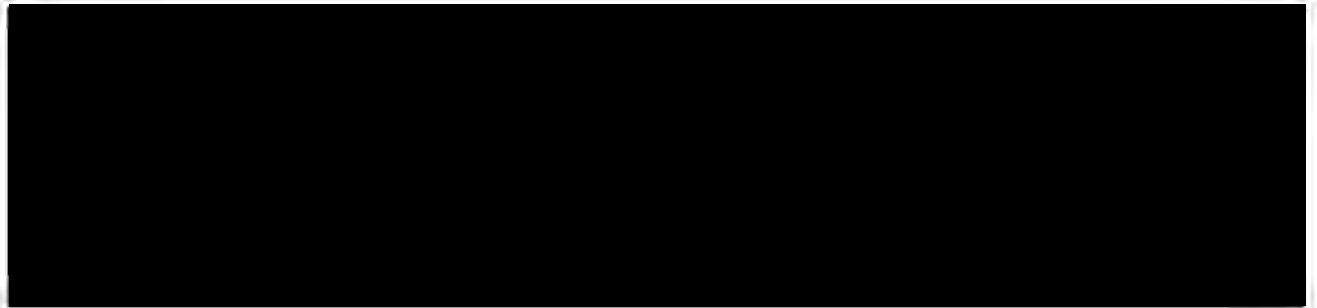
Name: Nathan O'Keeffe

Name: NEIL O'KEEFFE

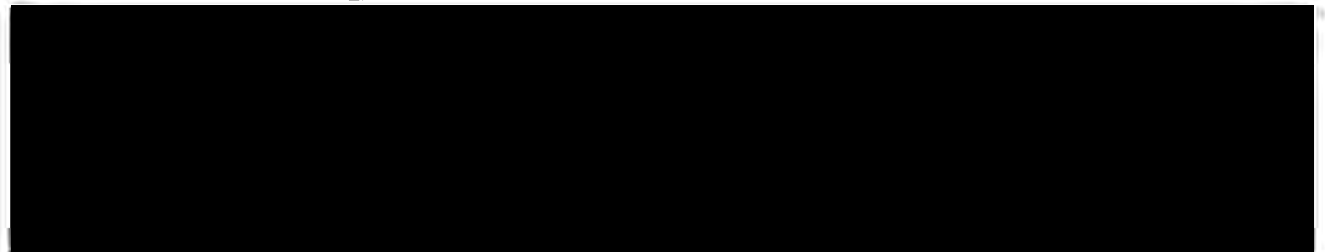


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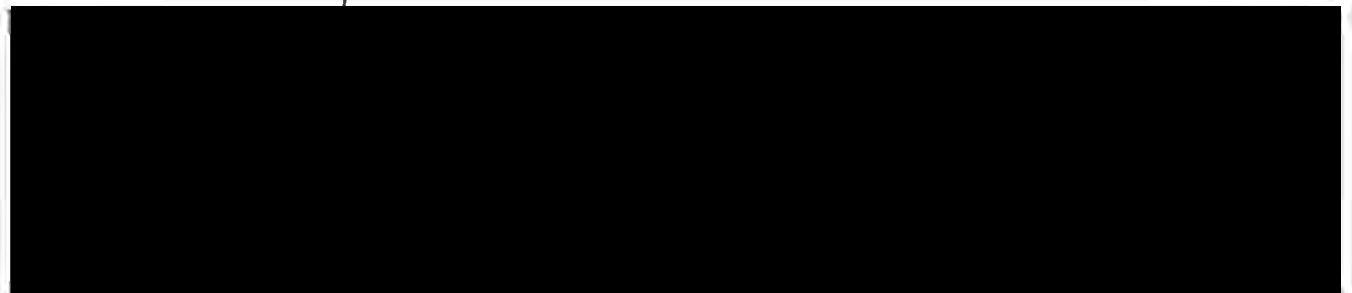
Name: DR CHERYL SMITH



Name: Victoria Smith



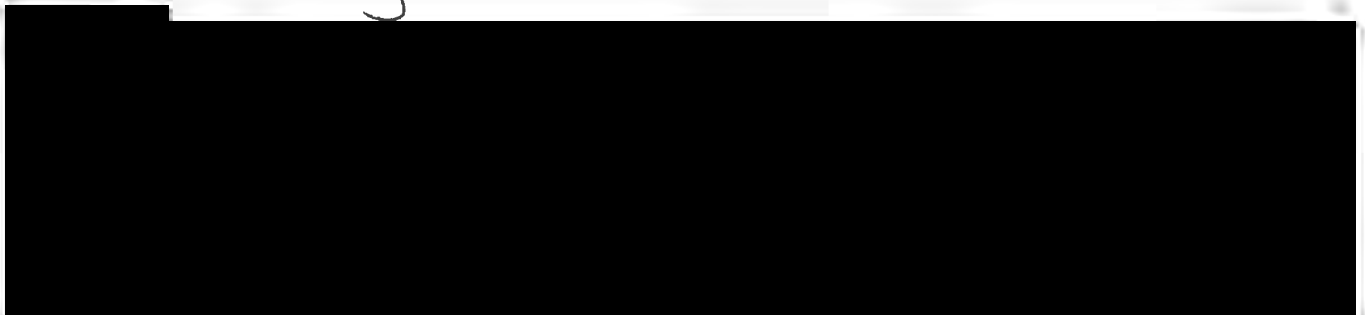
Name: IAN CROMS



Name: Dawn Craig



Name: Jack Craig





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Name:

B. Haywood

Name:

R. Middleton

Name:

Suneil Aggarwal

Name:

B Lockett

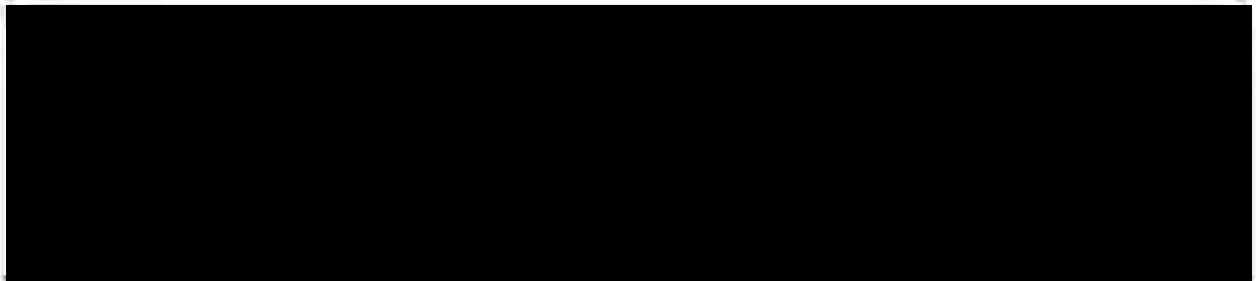
Name:

DAVID EDGERTON

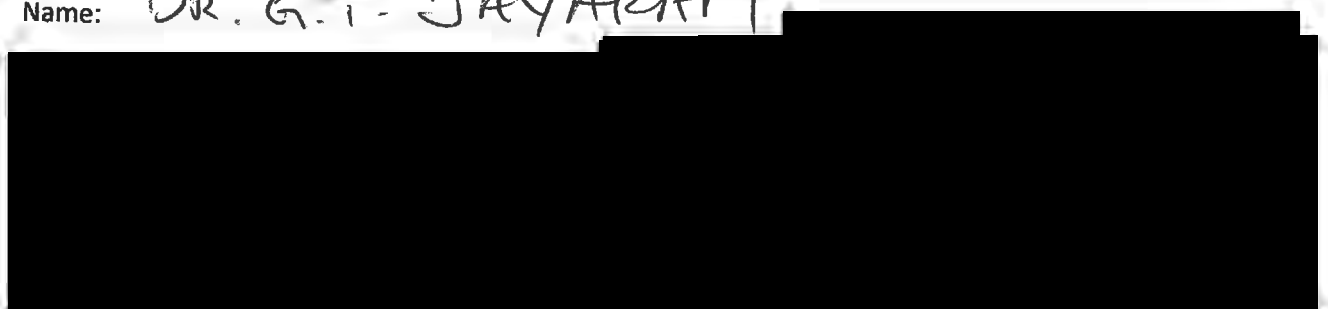


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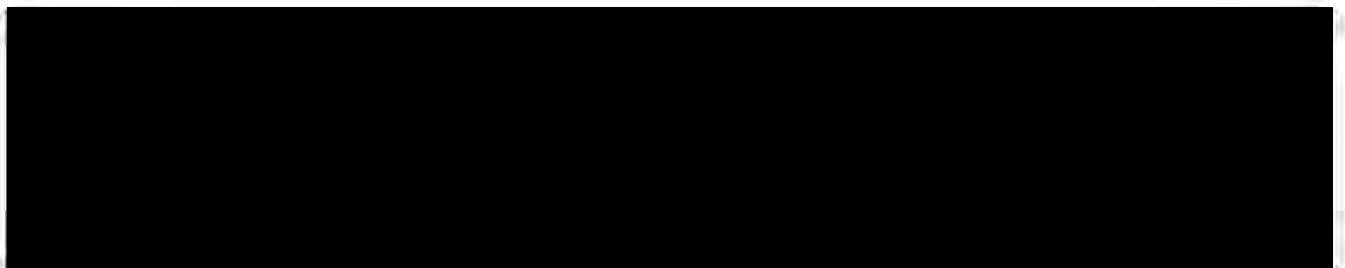
Name: CHRISTINE EDGERTON



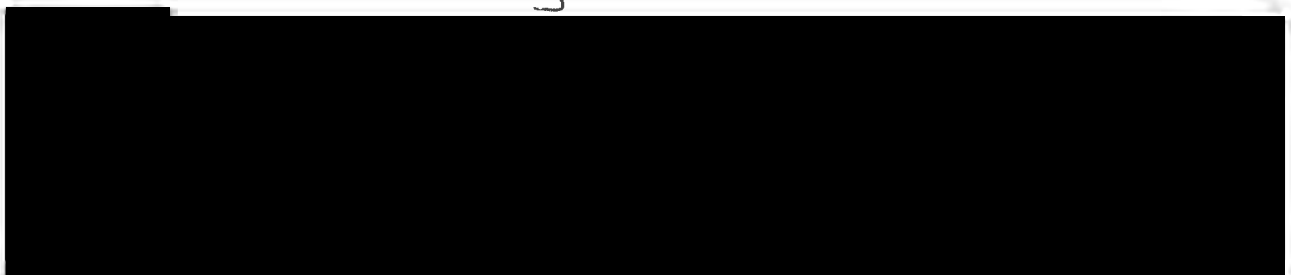
Name: DR. G. T. JAYARAM



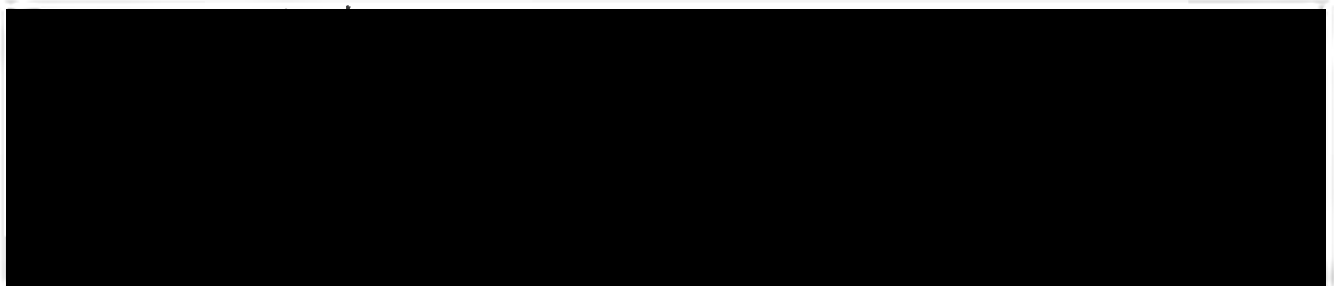
Name: LOUISE JUDGE



Name: Simon Gaffney



Name: Thomas Williams





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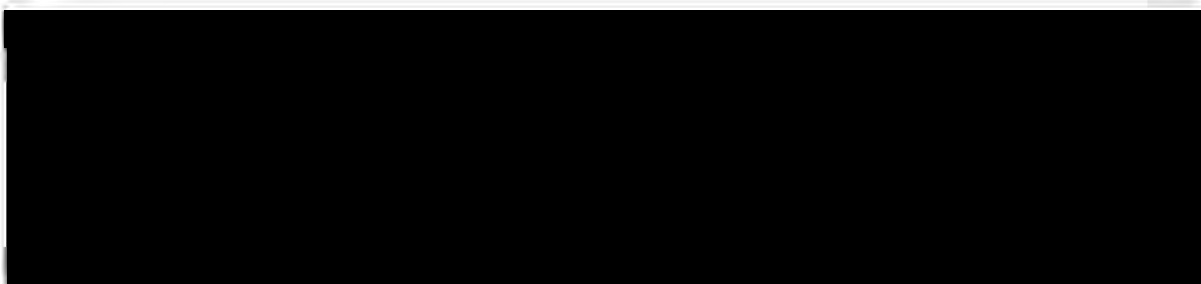
Name:

SIMON JONES



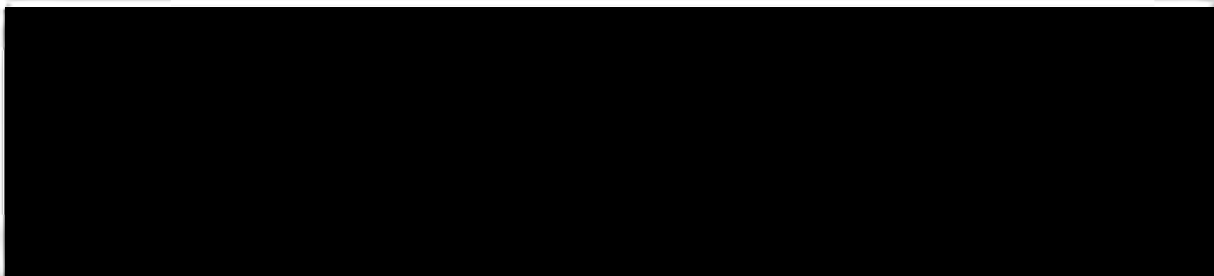
Name:

PETER COTTAM



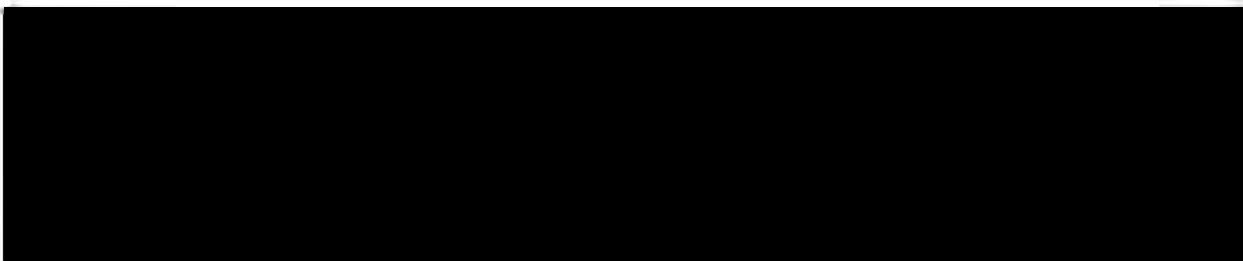
Name:

Jenna Cottam



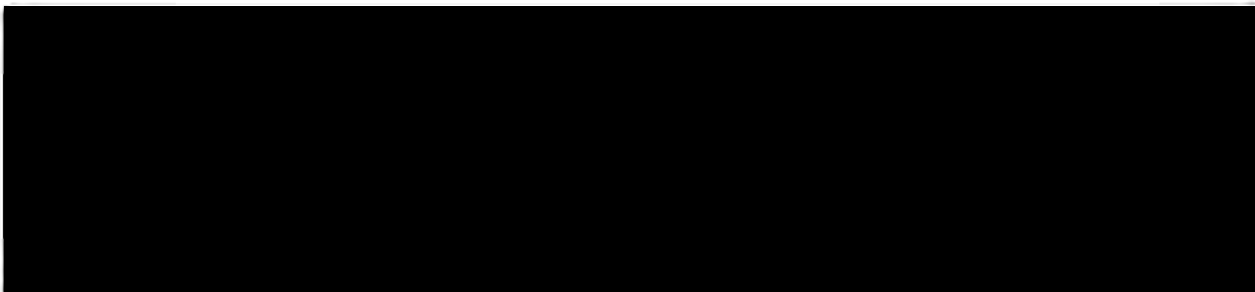
Name:

IAN NOLAN



Name:

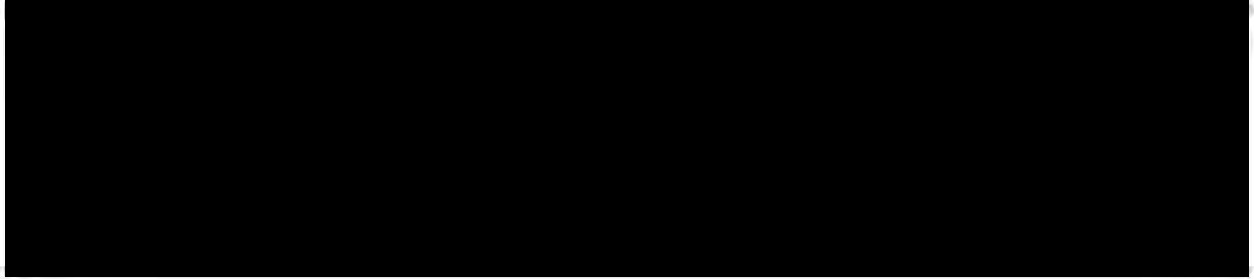
SHEILA NOLAN





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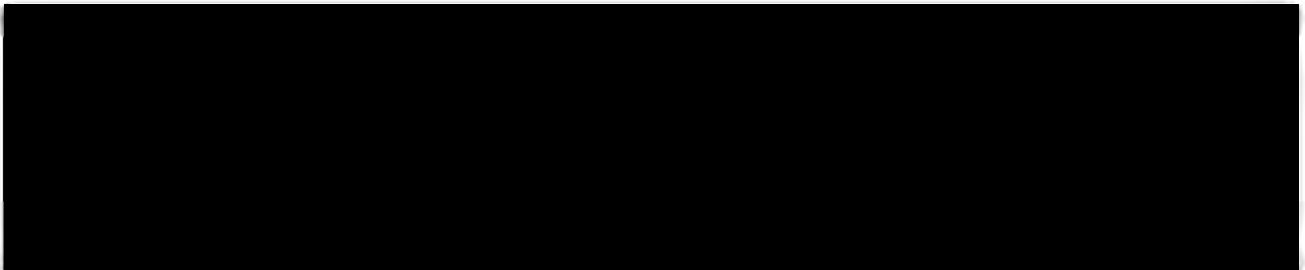
Name: NICOLA ONYETT



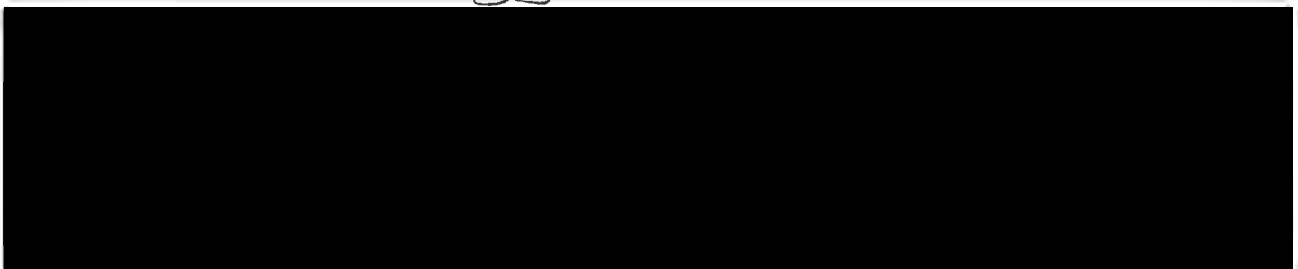
Name: Grace Onyett



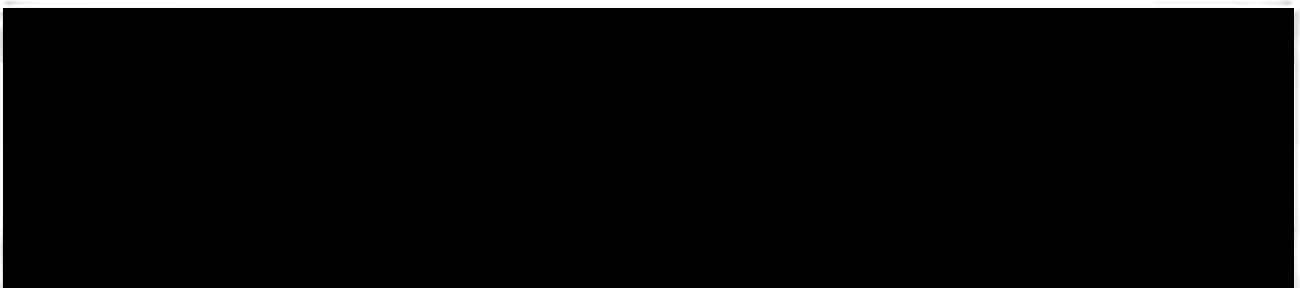
Name: MICHELLE HANNON



Name: PAULA EDWARDS



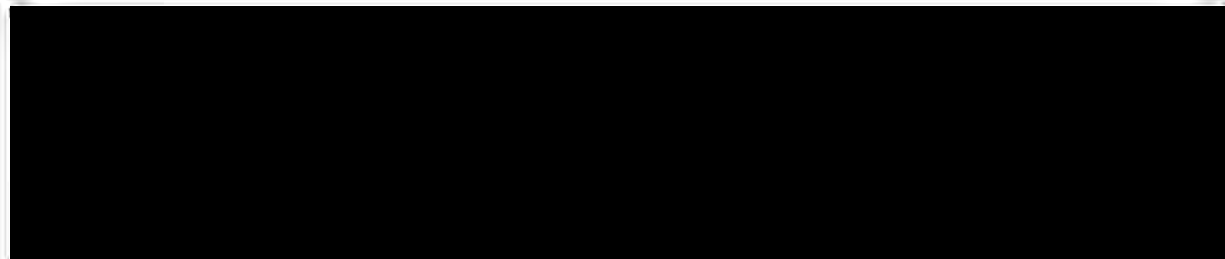
Name: GILL FARGIN



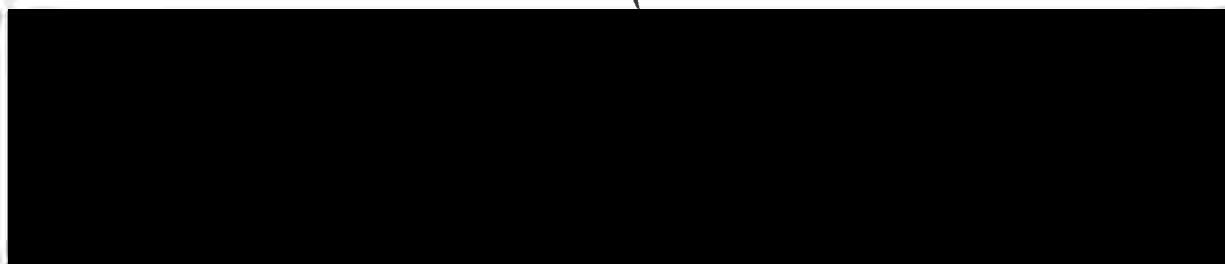


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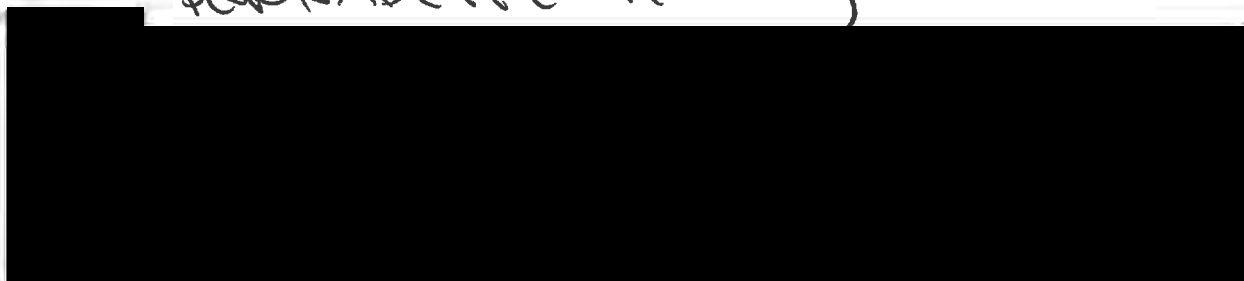
Name: MICHAEL VINCENT



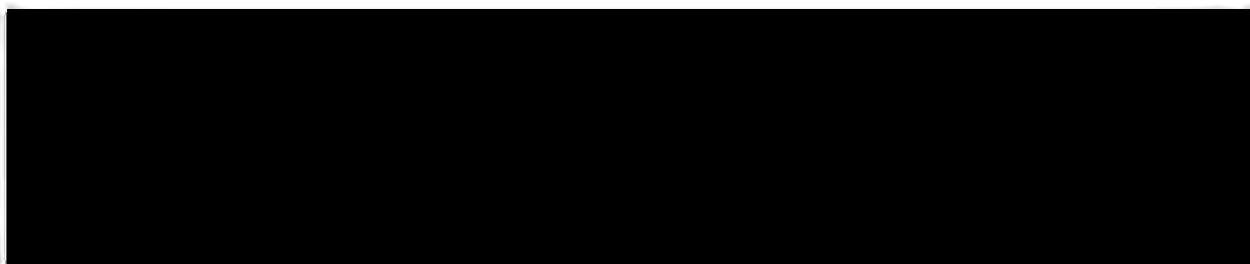
Name: ADRIAN MOONEY



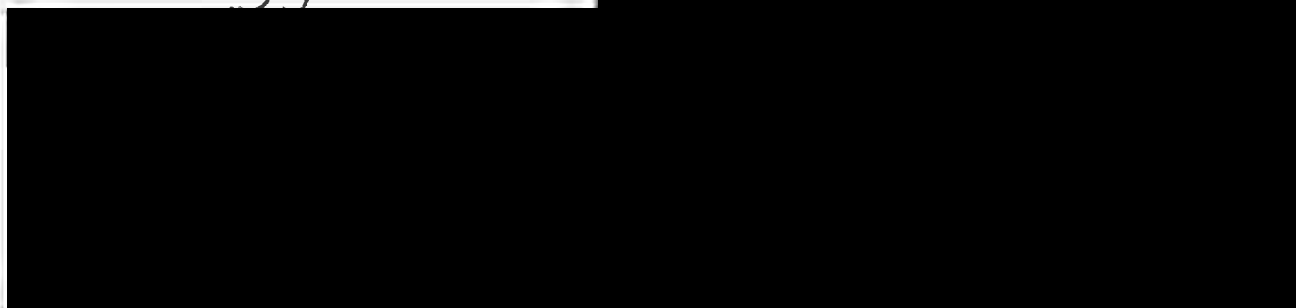
Name: BERNADETTE MOONEY



Name: PHIL ALEXANDER



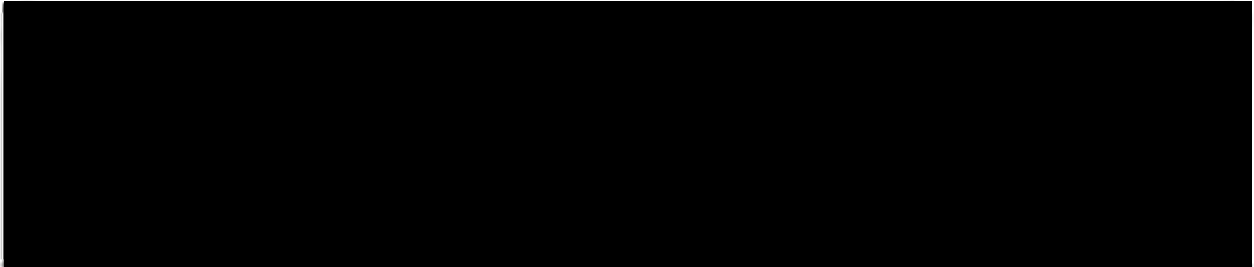
Name: Tayyaba Khan





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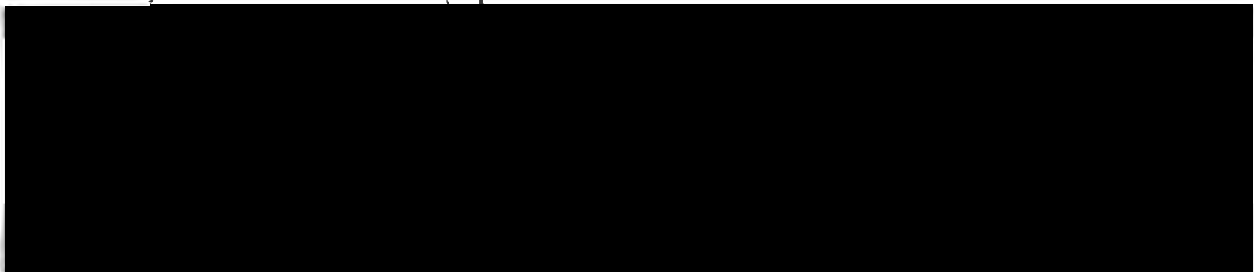
Name: EILEEN BALMER.



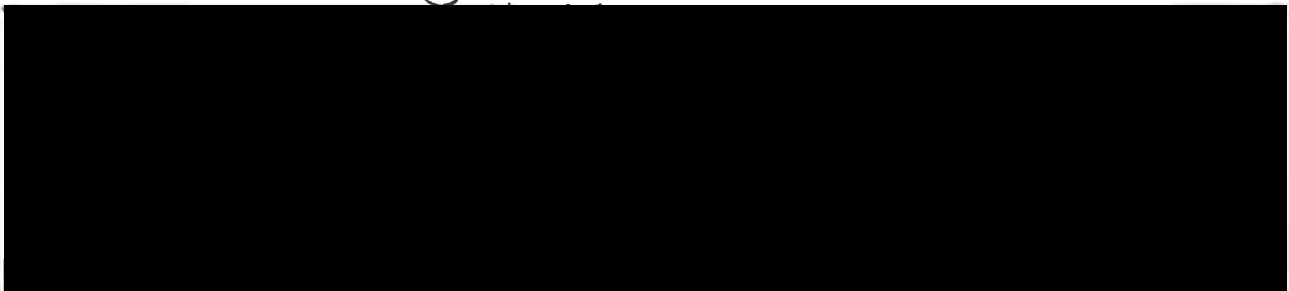
Name: Vicki Wignall



Name: Claire Brogan



Name: peter Brogan



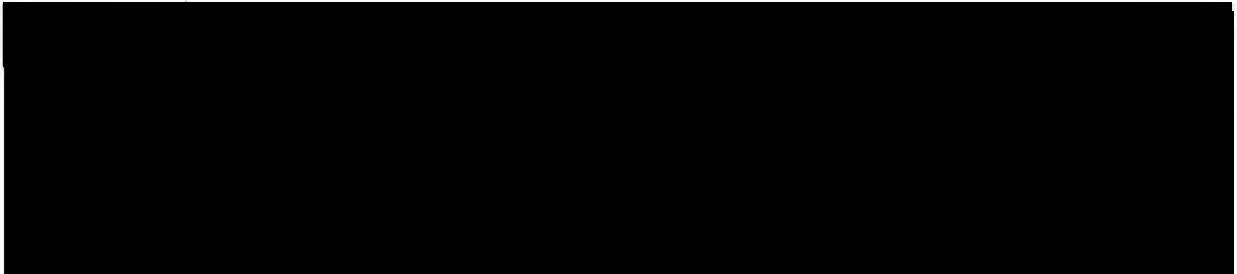
Name: Phil Wignall



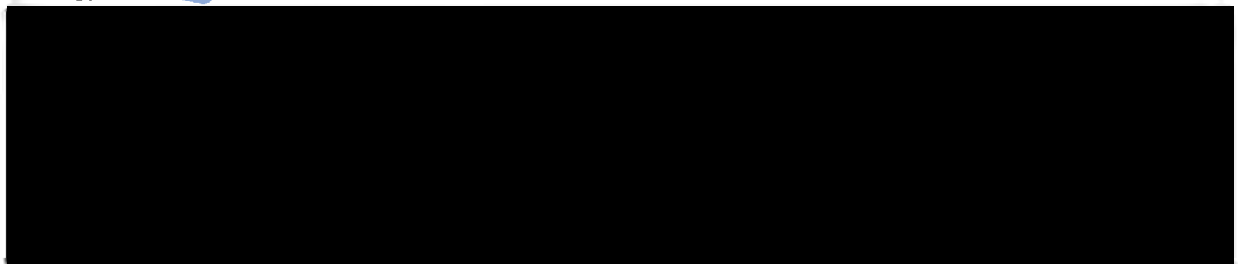


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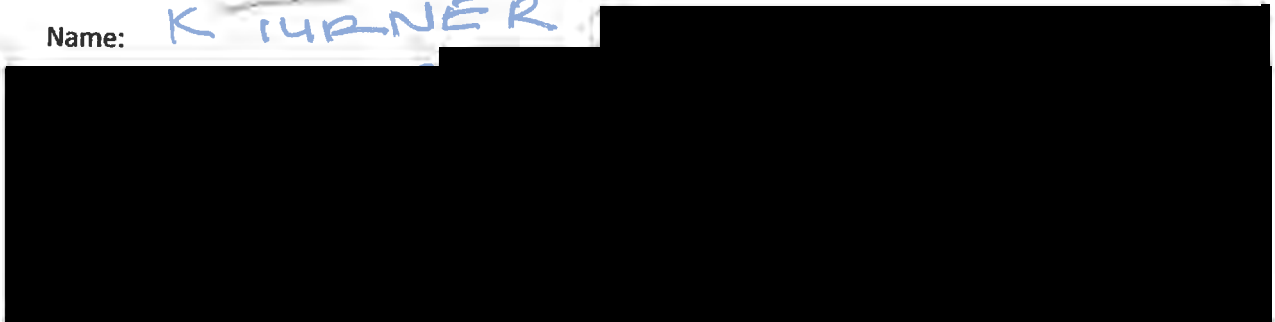
Name: JOE FAREGIR



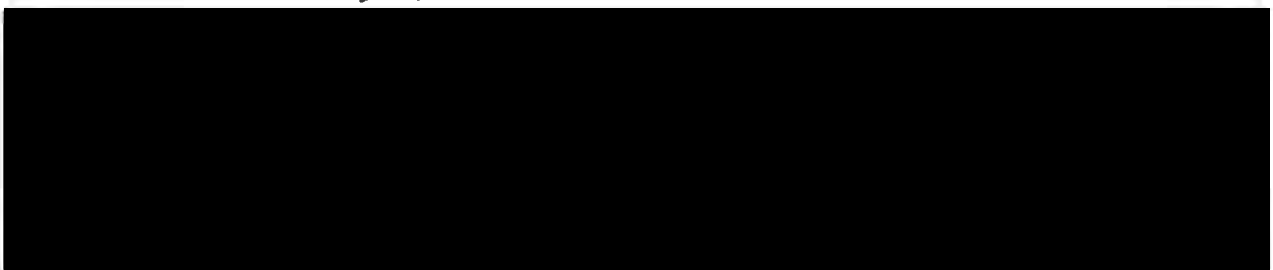
Name: Lynn Turner



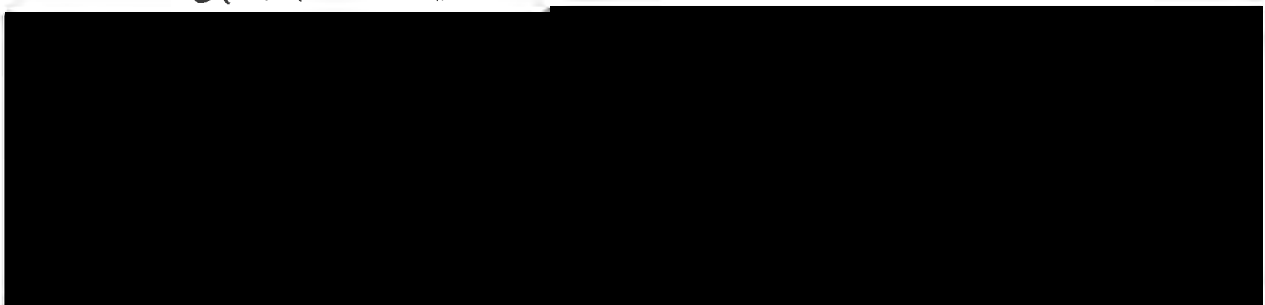
Name: K TURNER



Name: ELIZABETH HORTON



Name: GILLIAN HORTON





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Name: Mrs Sandra Tickle



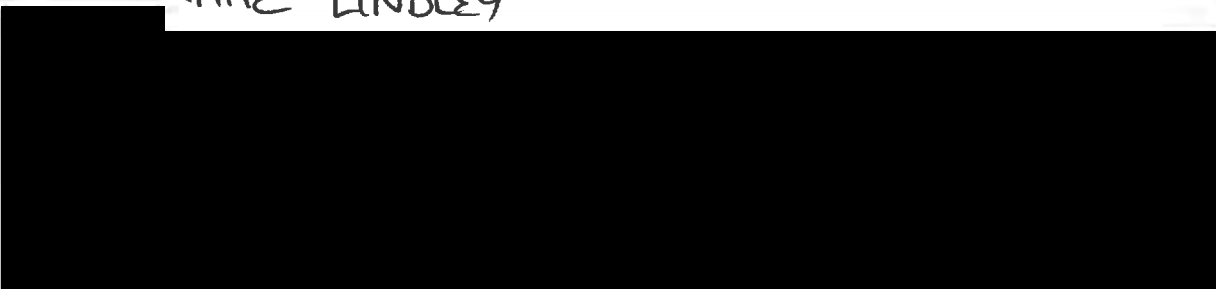
Name: Gaynor Lindley



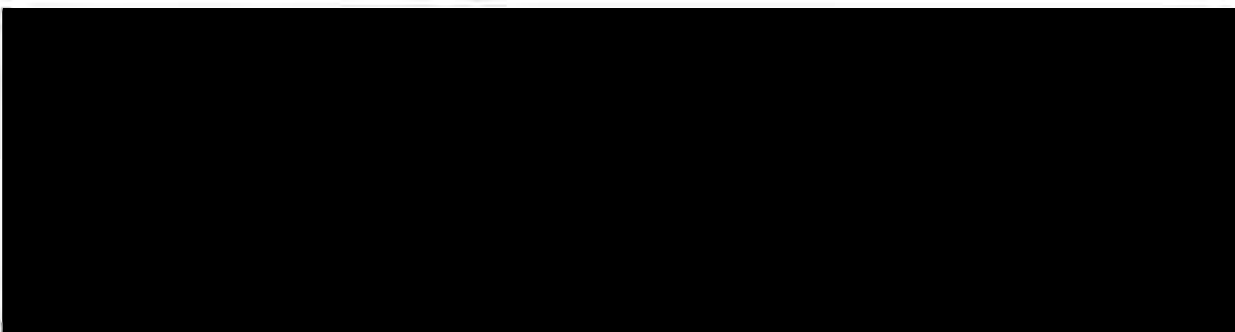
Name: Antony Lindley



Name: KATIE LINDLEY



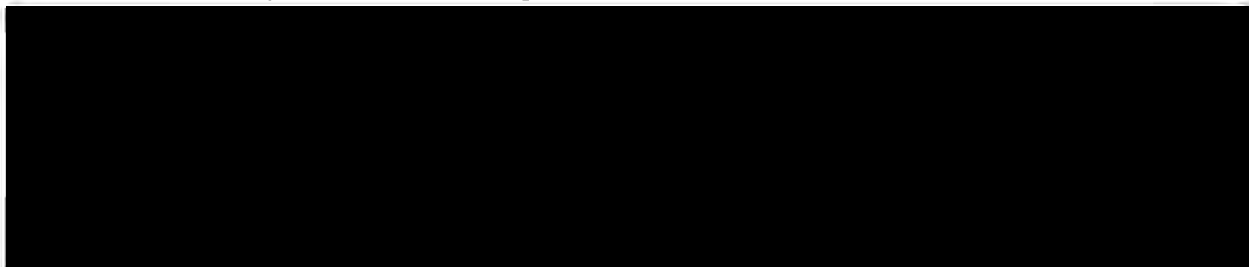
Name: NEIL FYLE





I give explicit permission for my name to be included in the Representation with the lead name of Adam Onyett regarding the St Helens Local Plan and confirm that we have worked together on this response.

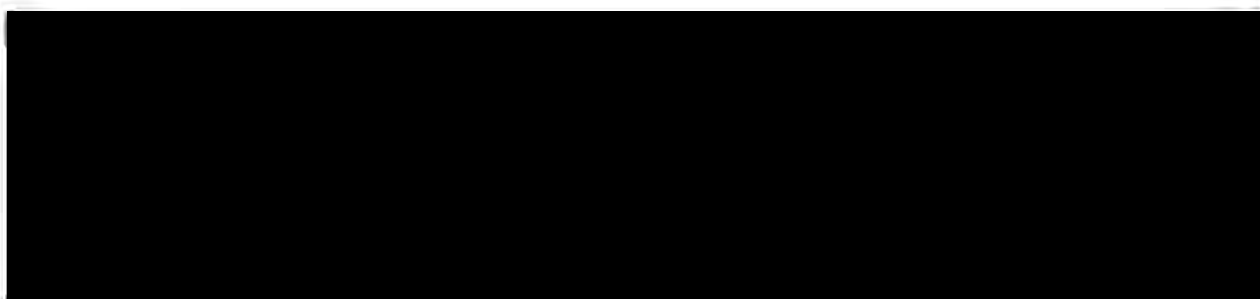
Name: TERENCE JUDGE



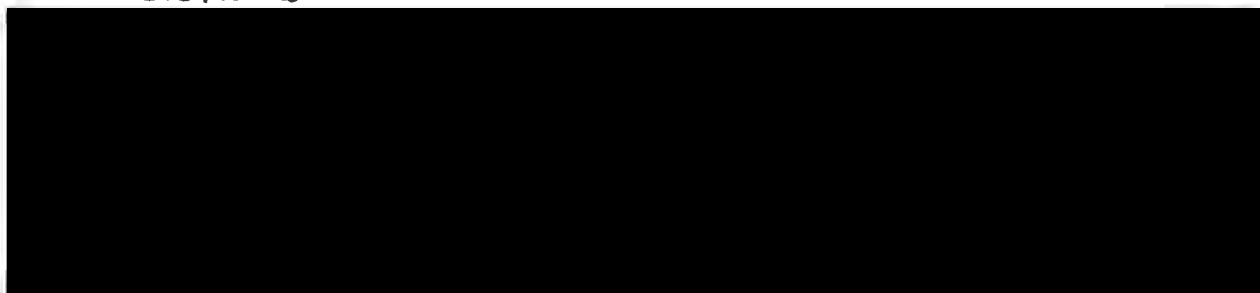
Name: OLIVER SUDGE



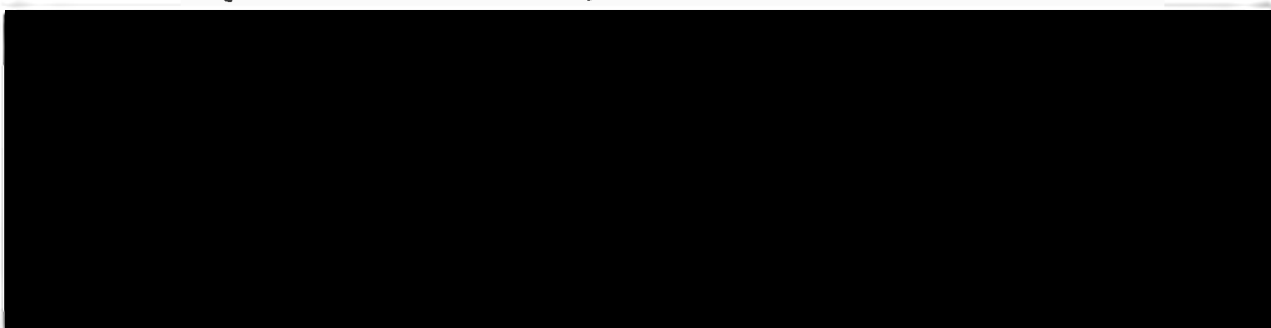
Name: PETER SMITH



Name: STEPHEN SMITH



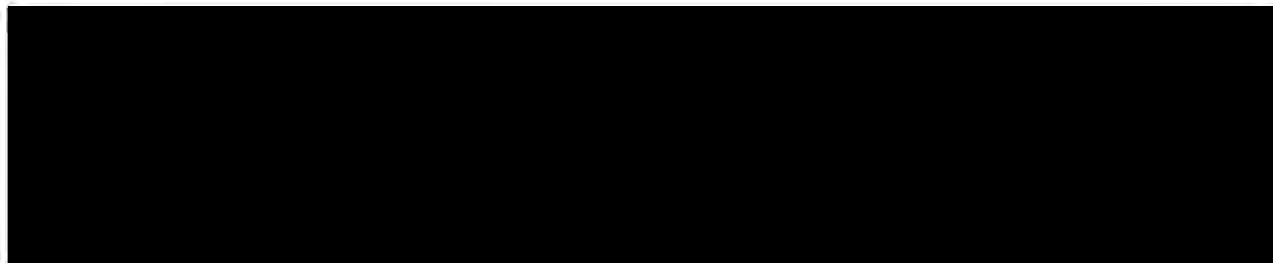
Name: JACQUELINE ANNE SMITH



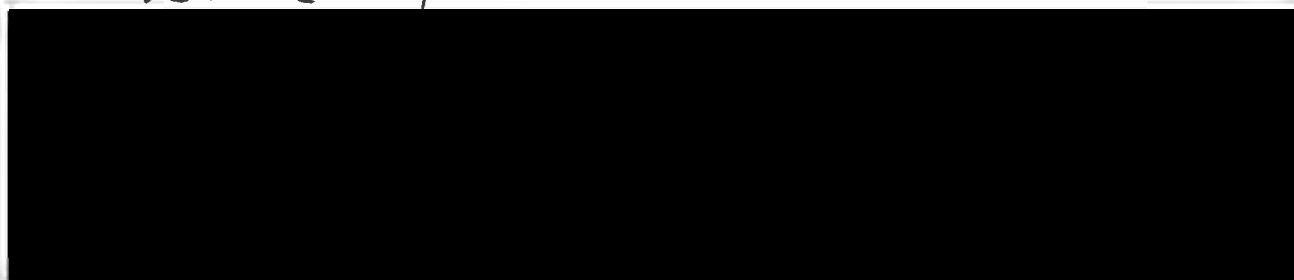


I give explicit permission for my name to be included in the Representation with the lead name of Adam Onyett regarding the St Helens Local Plan and confirm that we have worked together on this response.

Name: *Ricardo Hayduk*



Name: *Lorraine Hayduk*



Name:

Address:

Signature:

Date:

Name:

Address:

Signature:

Date:

Name:

Address:

Signature:

Date:



RO1351



927

Ref: LPSD

(For official use only)



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.** Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

10 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Sarah</u>	First name: _____
Last Name: <u>Orford</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Manston Bungalow</u> <u>31 Neills Road</u> <u>Bold</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>23.3.19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

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[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	IPA06	Paragraph/ diagram table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>for such a big increase in population there are not enough schools, doctors, shops, police. the roads could not cope with so much traffic. Pollution to our countryside would be detrimental. It would wipe out our wildlife. I was brought up in the countryside where I could just walk for hours going through each field and feeling safe. not getting lost in a built up area. not to mention the crime it could bring.</p>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1352



928

Ref: LPSD

(For official use only)



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**Part B - Your Representation(s)**

10 MAY 2019

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Nathan</u>	First name: _____
Last Name: <u>Orford</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Manston Bunglow</u> <u>31 Neills Road</u> <u>Bold</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
	No: _____

Signature: _____	Date: <u>21-3-19</u>
------------------	----------------------

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☐ No

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**Please use a separate copy of Part B  
for each separate comment/representation.**



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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>- No prior warning  - endangered wildlife  - traffic congestion  - noise pollution  - devalued property  - eye sore  - ruining the beauty of the green belt</p>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1353



929

Ref: LPSD

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

10 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Chloe</u>	First name: _____
Last Name: <u>orford</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Manston Bungalow</u> <u>31 Neills Road</u> <u>Bdd</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>21/3/19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table	LAPCG	Policies Map	3HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<ul style="list-style-type: none"> <li>• More houses more crime</li> <li>• Increase in traffic / pollution.</li> <li>• Endangered wildlife.</li> <li>• Not enough facilities - schools, doctors, dentists</li> <li>• [REDACTED] walks in the country something which will be affected if unwanted houses are built.</li> <li>• Finally devaluing houses.</li> </ul> <p>* These houses are <u>unwanted</u>.</p>	

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

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**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1354



930

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

10 MAY 2019

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: Lorraine

Last Name: Orford

Organisation/company: N/A

Address: 31 Neills Road

Bold

St Helens

Postcode: WA9 4SY

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: 23.3.19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

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post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph/ diagram table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	

Increase of traffic, Pollution. Harm to wildlife. Increase journey time due to more traffic  
 not enough facilities ie - schools, Doctors, Dentist,  
 we chose to move to this area. [REDACTED]  
 to bring our family up in the countryside so  
 we could take [REDACTED] on long walk  
 and show them the nice parts of St Helens.  
 not to look out onto overcrowded built up.  
 rows upon rows of houses. That one were  
 beautiful green fields. more houses more Crime

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

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**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1355



931

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

10 MAY 2019

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: Peter

Last Name: Orford

Organisation/company: \_\_\_\_\_

Address: Manston Bungalow

31 Neills Road

Bold

Postcode: WA9 4SY

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 23.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<b>LPA06</b>	Paragraph/ diagram table	<b>3HS</b>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The roads in this area are not capable of taking more traffic they flood now. Reduce greenbelt means less habitat for wildlife. House prices will be reduced due to not being in countryside but in a overcrowded over populated area. Big housing estates bring more crime. we don't have the policing to cover this. Therefore it will end up being a no go area. why not use brown belt area, there is enough empty factories in St Helens build on their and save what's left of our Countryside

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

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**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1356



932

Ref: LPSD

(For official use only)



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

10 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Faye</u>	First name: _____
Last Name: <u>Orford</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Manston Bungalow</u> <u>31 Neills Road</u> <u>Bold</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>23.3.19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



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post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
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**Please use a separate copy of Part B  
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## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph/ diagram table		Policies Map	3HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Every time it rains here the roads flood. Can you imagine adding another 7000 houses to that. I go running every day through these beautiful fields. I don't know how I will be able to do that if your going to build 7000 houses on my countryside. Not to mention the safety of each individual</p>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1357





St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Helen	First name:
Last Name: Osguthorpe	Last Name:
Organisation/company: Rutland House Vets	Organisation/company:
Address: 61 Benaske Drive	Address:
Postcode: WA12 8BE	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

25.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1358





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR.</i>	Title:
First Name: <i>DAVID</i>	First name:
Last Name: <i>OWEN</i>	Last Name:
Organisation/company: _____	Organisation/company:
Address: <i>17, NEWBOLD COURT, ST. HELENS</i>	Address:
Postcode: <i>WA9 4TE</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>24/04/2019</i>
-----------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1359





St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>ANNETTE</u>	First name:
Last Name: <u>OWEN</u>	Last Name:
Organisation/company: <u>—</u>	Organisation/company:
Address: <u>17, NEW BOLD COURT ST HELENS</u>	Address:
Postcode: <u>WA9 4TE</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

22.04.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1360





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

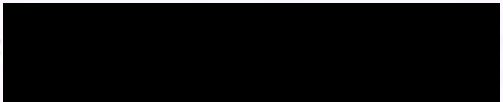
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>KATHLEEN</u>	First name:
Last Name: <u>OWEN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>49 FOREST RD</u> <u>SUTTON MANOR</u> <u>ST HELENS</u>	Address:
Postcode: <u>WN1 4AT</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date: 28/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1361





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: DEREK	First name:
Last Name: OWEN	Last Name:
Organisation/company:	Organisation/company:
Address: 49 FOREST RD SUTTON MANOR	Address:
Postcode: WA9 4AT STHELENS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

28/3/

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1362



**Representor Details**

Web Reference Number	WF0202
Type of Submission	Web submission
Full Name	Mr John Owen
Organisation	
Address	63 Alder Road Prescot Merseyside L34 2SG
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I firmly believe that the land of Eccleston Park Golf Club should not be removed from the Green Belt to become safe guarded and that the St Helens Borough Local Plan 2020-2035 is unsound for the following reasons.

As a local resident living very close to the golf course it is clear that the transport infrastructure, notably the road infrastructure is made up of already busy B roads struggling cannot cope with the current level of road traffic during peak times. Adding to this will only generate more traffic and therefore more noise and higher air pollution levels for the residents living in the area. Warrington Road (the only A road) in particular is already stretched serving various areas such as Rainhill, Prescot, Eccleston Park, Whiston etc. and this includes new developments such as Scotchbarn Lane, Stephenson Grove, Two Butt Lane and others. Between 2013 and 2015 St Helens was well above the national average for respiratory disease in the under 75's (51.9 deaths per 100,000 vs the average of 33.1 for the rest of England) with Thatto Heath one of the highest effected areas in the borough. Thatto Heath is one of the directly affected areas as a result of the removal of EPGC from the Green Belt and one that particularly can't afford any increase in deaths related to respiratory disease. On top of this the plan is putting pedestrian safety at risk with many residents choosing to walk to the local train station, bus stop or even the local shop. Other smaller estates and also minor B and C roads could also be impacted such as Alder Road which is already utilised by drivers as a shortcut.



Other roads such as Mill Lane, Longton Lane and Blundells Hill would likely see increase in traffic and such roads were never built to handle those levels of traffic meaning that significant investment would be required to make them suitable for the amount of traffic.. St Helens Council figures confirm that the junction of Portico Lane and Prescott Road are at capacity and as someone who uses this junction on a daily basis I am in agreement that from a safety perspective this junction cannot handle an increase in traffic. Cars will be required for any developments on ECPG as there simply is not enough local services to cope with the demand e.g. dentist, doctors, hospital and particularly school places. I believe that Brexit and the impact of it has also not been factored into this plan, we know that we have a declining population (since 1981) and that Brexit could further reduce the population so it is questionable as to where all the additional people are coming from to justify such an increase in housing. From reviewing the St Helens Council Brownfield register it is apparent that there is availability for 5808 houses. Table 4.6 illustrates a requirement for 7245 houses therefore leaving a need for 1437 houses, it is not clear why the local plan is detailing a 288 hectare requirement and this needs further explanation. We know that 3HS is a confirmed flood zone and has a very high water table, as my property has a small brook to the rear of the garden I think that building on EPGC would seriously put my property and many others at risk of flooding. Finally I have concerns that any development on EPGC would seriously impact existing property pricing by removing an area of natural beauty and essentially creating one continuous area of urban dwellings. It is also noted that Sport England objected to EPGC status being changed from a Golf Club at stage one and as far as I can see this objection has not been addressed by St Helens Council nor have the council provided any compelling evidence that there is an over subscription to golf within the area.

**7. Please set out modification(s) you consider are necessary**

St Helens Council should not consider removing Eccleston Park Golf Club land from the Green Belt to place in safeguarded for the reasons mentioned in this representation. Eccleston Park Golf Club should be removed from the proposal to remove from the greenbelt therefore abiding by the National Planning Policy Framework (2019).

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 9:15:50 PM
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RO1363





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

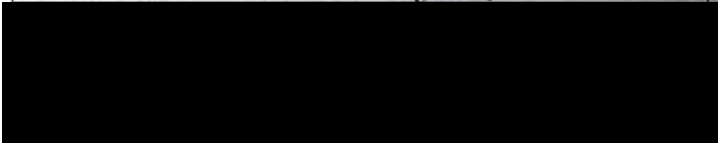
This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>MICHAEL</i>	First name:
Last Name: <i>OWENS</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9, CRANSHAW AVENUE CLOCK FACE ST. HELENS</i>	Address:
Postcode: <i>WA9 4UR</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

*8. 4. 19.*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1364





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

- Part B - Your Representation(s)**
- ① PAR 1.7-2
  - ② LPA02
  - ③ LPA04
  - ④ CEN 001
  - ⑤ LPA06
  - ⑥ IDP
  - ⑦ LPA08

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>IRENE</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK CREB</u> <u>WINDLE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA10 6DY</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>13.3.2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email) ☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

<b>4. Do you consider the St Helens Borough Local Plan 2020-2035 is:</b> Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO DEVELOPMENT ON GREENBELT UNTIL ALL BROWNFIELD  
SITES ARE USED - NO DEVELOPMENT ON GREENBELT  
(BHS) UNTIL ROAD INFRASTRUCTURE FIXED -

SEE ATTACHED SHEET

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate  
at the oral examination

Yes, I wish to participate at the oral  
examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated. ✓

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons: ✓

I believe that the Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities. ①

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy. ②

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development. ②

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere. ①

#### **Duty to Cooperate.**

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government). ③

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved. WEST LANC L.P. ③

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future. ②



## Employment Land

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

**If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.**

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. **For this reason I believe that the plan has not been positively prepared.**

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

## Brownfield sites

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

## Traffic Issues

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.



## Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. (6)

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **"Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"** (2)

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services." ✓

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure. (2)

**Community Infrastructure:** Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable. (7)

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring. *SUGGESTING NOOS!*

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection. ✓

Yours Sincerely

[Redacted Signature]

Mrs I M Oxford

39 Windlebrook Crescent, St Helens WA10 6DY



RO1365



PFOG 14  
SME 8HS

778

13 MAR 2019

Ref: LPSD

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

- ① PARA 1.7.2 DEC
- ② LPA02
- ③ LPA04
- ④ GENERAL
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK PASS</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>13-3-2019</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) ☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

<b>4. Do you consider the St Helens Borough Local Plan 2020-2035 is:</b> Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

<p><b>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</b></p> <p>Please read the Guidance note for explanations of the Tests of Soundness</p>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not Sound  
— SEE ATTACHED



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO BUILDING SHOULD TAKE PLACE UNTIL  
HIGHWAY INFRASTRUCTURE IS IN PLACE —  
SEE ATTACHED

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons:

I believe that the Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy.

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

No statement is available on how the Council has fulfilled its Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere.

#### **Duty to Cooperate.**

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government).

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved.

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.



## Employment Land

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

**If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.**

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. **For this reason I believe that the plan has not been positively prepared.**

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

## Brownfield sites

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

## Traffic Issues

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on **8HS** states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.



## Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. (6)

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe" (2)

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**Community Infrastructure:** Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable. (7)

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring. *Sustainable model?*

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours Sincerely

D A Oxford

39 Windlebrook Crescent, St Helens WA10 6DY



RO1366



Site 2HS

EL0277

① - LPA06



Objections to the St Helens Council Local Plan 2020 - 2035

to:

planningpolicy

08/05/2019 21:39

Planning Section.

I wish to submit the following objections relating to the <sup>2HS</sup>HA7 proposal of the St Helens Borough Council Local Plan 2020 to 2035.

(I have been unable to use the form available on the planning web site as it is unfit for purpose.)

I wish to object specifically to Proposal sub part <sup>now 2HS</sup>HA7 (Removal of land off Vista Road from Green Belt for future development.)

My main objections to removing proposed area HA7 from Green Belt are as follows:

A) Local health infrastructure is crumbling around the HA7 proposed development area. It already takes me 3 weeks to get a GP appointment. Our local clinic has closed and been redeveloped. It is no longer possible to find a space on Newton Cottage Hospital car park on most days due to overdevelopment of our town.

Considering recent and on-going massive increases in housing development in our area, the town becoming increasingly overcrowded and congested which affects our quality of life.

B) Traffic congestion and pollution at peak times on VISTA road has already reached intolerable levels. The HA7 proposal would further overload the area and have an adverse effect and make it worse.

C) Domestic water pressure in the surrounding areas to proposal HA7 already regularly drops below satisfactory levels. It is not just the responsibility of the utility companies but also that of the Local council planning strategy.

D) Further destruction of Green Belt land for housing development when several hundreds of houses have already been built in the local area.

Regards

Malcolm Paget  
66 Highmarsh Crescent  
Newton le willows  
Merseyside  
WA12 9WF



Virus-free. [www.avast.com](http://www.avast.com)



RO1367



936

Ref: LPSD

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

10 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>GRAHAM</u>	First name: _____
Last Name: <u>PARKER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13. DOUGLAS AVE</u>	Address: _____
<u>BORD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>12/3/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

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Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>WILDLIFE HABITAT WOULD BE DESTROYED. SKY LARKS NESTS IN THE FIELDS, ALONG WITH. PEEWITS. THIS IS A GREEN BELT AREA. WITH LOCAL FOOTPATHS FOR PEOPLE TO ENJOY. THERE ARE PLenty OF BROWN FIELD SITES THAT COULD BE CONSIDERED. THERE IS TOO MUCH TRAFFIC NOW ON GORSE LANE</p>	

ANJALIS Remy,

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

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**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1368



937

Ref: LPSD

(For official use only)



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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

10 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>TERESA</u>	First name: _____
Last Name: <u>PARNER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 Douglas Ave</u>	Address: _____
<u>Bury</u>	_____
<u>St. Helens</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: <u>[Redacted]</u>	Date: <u>13/3/19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out your comments</u> .
<p>This is a green belt area + should remain as such. There is plenty of brown land available elsewhere to build. The increase in traffic doesn't even seem to have been a consideration either. Lots of walkers + wildlife enjoy this area, + to turn it into a concrete jungle is just not acceptable.</p>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

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**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	--------------------------	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1369





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts:

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Ced</u>	First name: _____
Last Name: <u>Parkes</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>297, Liverpool Road</u> <u>Pewfall, Haydock</u>	Address: _____
Postcode: <u>WA11 0YN</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>/</u>	Mobile No: _____
Email: <u>/</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>12.3.19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy ①	LPA 05.1 [2HA] LPC 05	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> don't know
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

① unsound as it is irresponsible to build a housing estate within the ever-expanding economic zone of the A580 Liverpool-Manchester Corridor with the attendant noise, air pollution, speeding and ever-increasing traffic [mainly heavy]; an estate surrounded by existing traffic congestion [Clipsley Lane - Blackbrook]; an estate with limited supporting amenities/facilities. It is irresponsible to destroy the existing natural environment: woodland, nature, etc., particularly when existing housing lies unused; brownfield sites/land already for sale are ignored. There must be sites that are more appropriate for use.


②



to make the LP sound, the Authority must act fairly throughout its boundaries and take note of FACTS like traffic congestion, use of brownfield sites, existing land up for sale, the natural environment, pollution, facilities; as in act fairly and responsibly.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

<b>8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)</b>			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination



**Thank you for taking the time to complete and return this response form.**

1800756M



RO1370



(13)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

25 FEB 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>NRS</u>	Title: _____
First Name: <u>JOAN</u>	First name: _____
Last Name: <u>PARKINSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>436 GARSWOOD ROAD</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD WIGAN</u>	Address: _____
Postcode: <u>WN4 0XJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>22.2.19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

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post to:

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St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 SITE IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS DECLINED SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?</p> <p>ONE OF THE PURPOSES OF THE GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DEFUNCT AND OTHER LAND, USING GREENBELT DOES NOT DO THIS. RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.</p>



6. DETAILS OF WHY YOU CONSIDER THE LOCAL PLAN IS NOT LEGALLY COMPLIANT OR IS UNBOUND.  
CONTINUED.

HOUSING IN THIS AREA ISN'T SUSTAINABLE DUE TO LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES, PARKING AT THE TRAIN STATION IS LIMITED AND PEOPLE WHO USE THE TRAINS ARE PARKING IN SCHOOL LANE, STRANGE ROAD, STATION ROAD AND VICTORIA ROAD ALL DAY CAUSING AN OBSTRUCTION FOR BUSES AND OTHER ROAD USERS THE USE OF CARS IS BEING ENCOURAGED DUE TO LACK OF FACILITIES.

THE ACCESS TO THE SITE ON EITHER BILLINGE ROAD OR GARSWOOD ROAD IS NOT ADEQUATE DUE TO NARROW ROAD AND THE AMOUNT OF TRAFFIC ALREADY USING THESE ROADS. THERE A LOT OF WALKERS AND IT IS GETTING REALLY BAD CROSSING THE ROADS DUE TO THE INCREASING AMOUNT OF TRAFFIC. ANY NECESSARY HIGHWAYS WORK MUST BE FUNDED BY THE DEVELOPER AND NOT THE COUNCIL TAX PAYER.

THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.

NB CHILDREN WITH ASTHMA WILL SUFFER MOST DUE TO POLLUTION. ONE CHILD HAS DIED DUE TO THIS, AND IT IS ONE CHILD TOO MANY OVER ONE MILLION IN THE UK HAVE ASTHMA. ASSUMING EACH HOUSE HAS TWO ADULTS AND THEY BOTH HAVE A CAR THEN THAT IS OVER FOUR HUNDRED CARS ADDING TO THE POLLUTION AND EXTRA TRAFFIC



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DUE TO POLLUTION AND EXTRA TRAFFIC COMING FROM THE NEW DEVELOPMENT WOULD IT BE BETTER TO SPREAD THE BUILDING OF HOUSES CREATING LITTLE VILLAGES INSTEAD OF ESTATES WHICH ARE TOO BIG. THERE ARE TWO PLOTS OF LAND ON BILLINGHAM ROAD WHERE HOUSES HAVE BEEN PULLED DOWN AND ONE ON LEYLAND GREEN ROAD. LOOK FOR OTHER PLOTS. PLEASE KEEP OUR GREENBELT AS WE WILL NEED THIS FOR FARMING & GIVE INCENTIVES TO BUILDERS FROM FOR BROOKFIELD <sup>EG FREE PLANNING APPLICATION</sup>

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts:

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

25 FEB 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JOAN</u>	First name: _____
Last Name: <u>PARKINSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>436 GARSWOOD RD</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD WIGAN</u>	Address: _____
Postcode: <u>WN4 0XJ</u>	Postcode: _____
Tel No: <u>07</u>	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED] Date: 22.2.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy <i>LPSD</i> <i>LPA</i> <i>IHS</i> <i>06</i>	Paragraph/ diagram table	Policies Map <i>IHS</i>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Other documents (please name document and relevant part/section)

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS DECLINED SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?  
ONE OF THE PURPOSES OF THE GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER LAND, USING GREENBELT DOES NOT DO THIS  
RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT



6 IS NOT LEGALLY COMPLIANT OR IS UNBOUND.  
CONTINUED.

HOUSING IN THIS AREA ISN'T SUSTAINABLE DUE TO LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES, PARKING AT THE TRAIN STATION IS LIMITED AND PEOPLE WHO USE THE TRAINS ARE PARKING IN SCHOOL LANE, STRANGE ROAD, STATION ROAD AND VICTORIA ROAD ALL DAY CAUSING AN OBSTRUCTION FOR BUSES AND OTHER ROAD USERS THE USE OF CARS IS BEING ENCOURAGED DUE TO LACK OF FACILITIES.

THE ACCESS TO THE SITE ON EITHER BILLINGE ROAD OR LEYLAND GREEN ROAD IS NOT ADEQUATE DUE TO NARROW ROAD AND THE AMOUNT OF TRAFFIC ALREADY USING THESE ROADS. THERE A LOT OF WALKERS AND IT IS GETTING REALLY BAD CROSSING THE ROADS DUE TO THE INCREASING AMOUNT OF TRAFFIC. ANY NECESSARY HIGHWAYS WORK MUST BE FUNDED BY THE DEVELOPER AND NOT THE COUNCIL TAX PAYER.

THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.

NB CHILDREN WITH ASTHMA WILL SUFFER

MOST. OVER ONE MILLION CHILDREN HAVE ASTHMA IN THE UK. ASSUMING EACH HOUSE IS OCCUPIED BY TWO PEOPLE AND EACH HAVE A CAR THEN THAT IS OVER FOUR HUNDRED CARS ADDING TO THE POLLUTION.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DUE TO POLLUTION AND EXTRA TRAFFIC COMING FROM THE NEW DEVELOPMENT WOULD IT BE BETTER TO SPREAD THE BUILDING OF HOUSES CREATING LITTLE VILLAGES INSTEAD OF ESTATES WHICH ARE TOO BIG. THERE ARE TWO PLOTS OF LAND ON BILLINGHAM ROAD WHERE HOUSES HAVE BEEN PULLED DOWN AND ONE ON LEYLAND GREEN ROAD. LOOK FOR OTHER PLOTS. PLEASE KEEP OUR GREENBELT AS WE WILL NEED THIS FOR FARMING

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



RO1371





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2018

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

01 MAR 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>BRIAN</u>	First name: .....
Last Name: <u>PARKINSON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>566 GARSWOOD ROAD</u> <u>NORTH ASHTON, NR. WIGAN</u>	Address: .....
Postcode: <u>WN4 0XA</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: .....	Email: .....

Signature: [REDACTED]	Date: <u>26th FEB 2019</u>
-----------------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
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St Helens  
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or by hand delivery to:

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## NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA05</b> <b>SITE</b> <b>1 HA</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified. The council should provide strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the people coming from?? The access on Billinge Rd or Garswood Rd would be inadequate. Any works necessary must be funded by developer not council taxpayers. The green belt was created to prevent urban sprawl and over development. The proposals in the local plan would go against this totally. The council's own register shows that there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply, even on its inflated figures, for nearly 12 years. Green belt land should only be released in exceptional circumstances. There are no exceptional circumstances in St Helens due to falling population. Housing in this area is not sustainable due to lack of school places, doctors surgeries, bus routes and other services. There is no statement of common ground with neighbouring authorities. The rail station does not support pram or wheelchair access.

Please continue on a separate sheet if necessary



1

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal of the greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

01 MAR 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: .....
First Name: <u>BRIAN</u>	First name: .....
Last Name: <u>PARKINSON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>566 GARSWOOD ROAD</u> <u>NORTH ASHTON NR. WIGAN</u>	Address: .....
Postcode: <u>[REDACTED]</u>	Postcode: .....
Tel No: <u>[REDACTED]</u>	Tel No: .....
Mobile No: <u>[REDACTED]</u>	Mobile No: .....
Email: .....	Email: .....

Signature: <u>[REDACTED]</u>	Date: <u>26th FEB 2019</u>
------------------------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

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Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

- Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA06</i> <i>SITE</i> <i>IHS</i>		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p><b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p><i>Plan not justified - The council should provide strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the people coming from? One of the purposes of Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purpose of greenbelt. Housing in this area is not sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged due to lack of facilities. There is no statement of common ground with other authorities. Local rail station does not support pram and wheelchair access.</i></p>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal of the Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1372





St. Helens  
Council

492

12 MAR 2019

Ref: LPSD

(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>GLENNIS</u>	First name: _____
Last Name: <u>PARKINSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>37 SPRINGFIELD PARK</u>	Address: _____
<u>HAYDOCK</u>	_____
<u>ST. HELENS MERSEYSIDE</u>	_____
Postcode: <u>WA11 0XP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>5<sup>th</sup> March 2019</u>
------------------	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓ *please use postal address*



## **RETURN DETAILS**

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St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Telephone: **01744 676190**

## **NEXT STEPS**

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**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LP AO4	SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes <i>Don't Know</i>	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1) NO exceptional circumstances, to release this land</p> <p>2) This release of Greenbelt will cause significant harm to purposes of the Greenbelt</p> <p>3) The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North - 2 massive warehouses.</p> <p>4) High volumes of predicted traffic, on country lanes, will add to the already over capacity on the highways in the vicinity.</p> <p>5) Not justified - The council should be put to strict proof of the need for this type of development here and on this scale - plenty of empty warehouses already on Haydock Industrial Estate.</p> <p>6) Brownfield &amp; derelict sites should be used first - plenty in St Helens.</p> <p>7) No statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

*Delete this land from the proposed removal from the Greenbelt -*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





St. Helens  
Council

① - LPA06  
② - Statement of Common Ground 508 12 MAR 2019

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts:

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>GLENNIS</u>	First name: _____
Last Name: <u>PARKINSON</u>	Last Name: _____
Organisation/company: <u>Resident.</u>	Organisation/company: _____
Address: <u>37 SPRINGFIELD PARK</u> <u>HAYDOCK</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA11 0XP</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: \_\_\_\_\_

Date: 10/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (~~via email~~) postal address please ☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

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Telephone: **01744 676190**

## **NEXT STEPS**

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**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA 06	SITE 2ES	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- 1) Not justified — the Council should be put to strict proof of the need for this type of development, in this position and on this scale.
- 2) As this site is allocated as Safeguarded until after 2035 and given the lifespan of this type of warehouse development, the site should remain in the Greenbelt so that the whole question of need can be re-evaluated at the end of the Local Plan Period.
- 3) One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.
- 3) The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Please continue on a separate sheet if necessary

See next sheet



Continuation sheet — Glennis Parkinson  
Policy LPA. OK Site 2ES

- 4) The Council has already granted planning permission in the Greenbelt in respect of site 2EA — Florida Farm North — a massive development of 2 gigantic warehouses, which are less than two miles from this site and has received applications for similar developments at SEA, land to the west of Haydock Lane and SEA, Parkside West, Newton-le-Willows. Why should this area be the Warehouse Capital of St. Helens? ①
- 5) High volumes of predicted traffic will add to the already over capacity on Junction 23 of the M6.
- 6) There is no statement of common ground with neighbouring authorities ②



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

*Delete this land from the proposed removal from the Greenbelt*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



FF0476

①-LPA05

523

②- Statement of Common Ground

12 MAR 2019



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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**Part A - Personal Details**

**Part B - Your Representation(s)**

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>GLENNIS</u>	First name: .....
Last Name: <u>PARKINSON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>37 SPRINGFIELD PARK</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST. HELENS</u>	.....
Postcode: <u>WA11 0XP</u>	Postcode: .....
[Redacted]	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: [Redacted]	Date: <u>5/3/19</u>
-----------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. — use postal address please.



## **RETURN DETAILS**

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## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA</b> <b>-05</b>	<b>SITE</b> <b>2HA</b>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Don't Know	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	

- 1) There are no exceptional circumstances for the release of Greenbelt in St Helens. The population of St Helens has been in decline since 1981. Housing in St Helens is comparatively cheap and in low demand.
- 2) One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and urban land. Using Greenbelt facts to encourage this.
- 3) The population of St Helens has significant health problems — high rates of heart and lung disease, childhood obesity. It is a heavily polluted area. To destroy the greenbelt is a step in the wrong direction.

Please continue on a separate sheet if necessary

See separate sheet



Re LPA 05 Site 2HA. Continued

- 4) Housing in the area isn't sustainable because of the lack of school places, medical centres, bus and train services. and other services. The use of cars is being encouraged because of the lack of facilities.
- 5) The proposal for a left-in/left-out from the East Lancashire Road to this site just isn't safe and would cause major problems. Another junction at Liverpool Road and Vicarage Road would totally overburden the roads nearby. The infrastructure just isn't there to cope with so ~~many~~ many added vehicles.
- 6) There are existing flooding problems on this site. During wet weather large ponds appear. Remedies to prevent this would place even greater problems for the Clipsey Brook.
- 7) The Council's own register shows there is enough brownfield land in St Helens for 5,818 houses. Use Brownfield and derelict land before Greenbelt is released.
- 8) The reasons for release of Greenbelt is not justified and St Helens Council should prove how the population will increase.
- 9) There is no statement of common ground with neighbouring authorities.
- 10) As proved recently with worries about imported produce, (BREXIT) we need all the Greenbelt so we can grow our own crops. Once Greenbelt is gone this would be impossible.



11) Because Haydock High School is a poor performing school many residents send their children to schools in the neighbouring Borough of Wigan. This also applies to the Catholic School (Secondary)

12) Use of Greenbelt for development should not be used as a "quick fix" to ~~manage~~ cover the financial problems of the Council.



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal  
from the Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

X

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



**Representor Details**

Web Reference Number	WF0310
Type of Submission	Web submission
Full Name	Mrs Glennis Parkinson
Organisation	
Address	37 Springfield Park Haydock St.Helens Merseyside WA11 0XP
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA 06 Site 2HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I do not understand why this site is being safeguarded.

It is a sustainable site for development

It has the benefit of - perfect transport links of regular bus and train services etc

School places and medical services widely available

No flooding problems

Park side development would give job opportunities to new residents

Newly refurbished leisure facilities nearby.

Newly refurbished Newton Railway Station within 1 mile providing the city centres on a regular basis.

Daytime/evening economy of the Newton le Willows High Street

The market town of Earlestown nearby

**7. Please set out modification(s) you consider are necessary**

This site should be allocated for immediate delivery. Many people want to live in this area.



**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/7/2019 3:30:31 PM
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RO1373





St. Helens  
Council

834  
①-LPA05 ②-Statement of Common Ground  
③-LPA06 ④-Statement of Common Ground  
13 MAR 2019  
St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

### **PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: DENNIS <del>PARKINSON</del>	First name:
Last Name: PARKINSON	Last Name:
Organisation/company:	Organisation/company:
Address: 436 GARSWOOD ROAD NORTH ASHTON NEAR WIGAN	Address:
Postcode: WN4 0XJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

5-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

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### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

<b>3. To which part of the Local Plan does this representation relate?</b>							
Policy	LPAS	Paragraph / diagram / table		Policies Map	HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

<b>4. Do you consider the St Helens Borough Local Plan 2020-2035 is:</b>		
<i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

<b>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</b>	
<i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

Growing up I remember the coal pits, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mine shafts under all the fields and under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?



Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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**8. If you wish to participate at the oral part of the examination, please indicate whether you wish to participate at the oral part of the examination.**

<input checked="checked" type="checkbox"/>	<b>No, I do not wish to participate at the oral examination</b>	<input type="checkbox"/>	<b>Yes, I wish to participate at the oral examination</b>
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**9. If you wish to participate at the oral part of the examination, please indicate whether you wish to participate at the oral part of the examination.**

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## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### **3. To which part of the Local Plan does this representation relate?**

Policy	LPA06	Paragraph / diagram / table		Policies Map	1 HS	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

#### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

#### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

#### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

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Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

3



causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. ~~I have lived in Garswood/Simms Lane End for seventy years.~~ Growing up I remember the coal pits, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and [REDACTED]

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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RO1374



Meadowcroft  
Houghtons Lane  
Eccleston, St. Helens.  
WA10 5LD

Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
WA10 1HP

01 MAR 2019

262

Dear Sir,

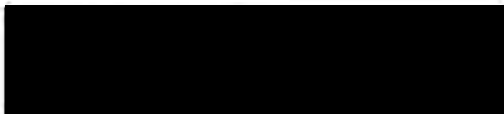
ST. HELENS BOROUGH LOCAL PLAN; SUBMISSION DRAFT  
TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REG. 2012

I am writing with regard to the reclassification of land now known as 8HS in the Local Plan (2020-2035).

Why has this land not been taken out of the Local Plan and given back to Green Belt status completely? There are Brownfield sites that are already available (with clean up needed) and who knows how many more sites may come available between now and 2035.

The agricultural land in our area is Grade 1 and 2 (the best in Europe). We may need this land to sustain our own needs re food production in the future. Once the Green Belt protection has gone, we can't get it back.

Yours faithfully



Mrs. K. Parkinson

27.2.2019



RO1375



**Representor Details**

Web Reference Number	WF0122
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 OXP
Agent Details	-----

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA0 Site 4EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

①  
LPA05

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council has today, 12 March 2019, announced that it has extended the consultation period for the residents of Bold and Clock Face for a further eight weeks because of the problem outlined in the above paragraph. Can the Council now be satisfied that all persons throughout the Borough who live within 200 metres of the boundary of a site which is affected by the proposals have been written to. If they aren't satisfied then they should abort the process and re-commence the consultation after making sure that all appropriate properties have received the same correspondence.

② LPA04

This comment is in respect of LPA04 Site 4EA, land south of Penny Lane. On page 221 of the Local Plan there is a Plan showing the location of the site and underneath there are the requirements of

V



the Council. One of these is that the design and layout of the development must integrate well with that of the surrounding area.

The site is immediately adjacent to the 4 star Haydock Mercure Hotel, a Georgian style building opened in 1992 or thereabouts. To add a warehouse to the adjacent site will detract from the setting of this hotel, a setting that has already been compromised by the Council having granted planning permission for a plant hire company to the rear and side of the hotel.

That plant hire company has been permitted to cut down the trees and bushes that screened it from the A580, a prominent Gateway Corridor, according to the Council's proposal in Policy LPD06, at page 153 of the Local Plan. At night the site is floodlit and all that can be seen from the A580 Prominent Gateway Corridor is the large plant which is for hire. —

The land at the rear of the Mercure Hotel is known as Empress Park and the advertising brochure for the development features an office building with a round glass tower fronting the A580. The reality is far from the idyll advertised by the brochure.

The Council appears to be obsessed with putting all its employment eggs in the basket of warehousing and a further warehouse on this site cannot be justified.

For these reasons I believe that the Local Plan isn't Legally Compliant or Sound. It isn't positively prepared because it can't justify the need for this type of development and it isn't effective because of the location adjacent to the 4 star hotel.

**7. Please set out modification(s) you consider are necessary**

This site should be removed from the list of sites to be deleted from the Greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 10:23:49 PM
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①-LPA06      ②-GEN      ③- Statement of Common Ground

#### Representor Details

Web Reference Number	WF0168
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

②

①



The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate.

Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

①

③

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 7:03:24 PM
---------------	----------------------



①-LPA05 ②-GEN ③- Statement of Common Ground

#### Representor Details

Web Reference Number	WF0169
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

②

①



The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

That this land be deleted from proposed removal from the Greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 6:56:30 PM
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**Representor Details**

Web Reference Number	WF0226
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	---

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA04 - Sites 2EA, 5EA and 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

Until the last two years or so St Helens had two free newspapers delivered on a regular basis. The St Helens Reporter is now available online only and the St Helens Star doesn't appear to be delivered in all areas and in large swathes of the Borough it isn't available for purchasing in the shops. It should not be the responsibility of pro Greenbelt Groups to bring the Local Plan to the attention of the public, that is what the Council should be doing to fulfil its statutory obligations.

A development in this position and on this scale isn't justified. Given the number of empty units in St Helens and in adjoining areas and the similar proposals in those areas, the Council should be put to strict proof of the need for these warehouses.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that it will close the Green spaces between the settlements of Haydock, Garswood and Blackbrook.



This representation is in respect of Policy LPA04 – Sites 2EA, 5EA and 6EA, all situated to the North of the A580 East Lancashire Road, Haydock and bounded by the A580, Slag Lane, Liverpool Road, Millfield Lane and Haydock Lane a total of almost 65 hectares or 160 acres of Greenbelt farmland to be covered in concrete, tar macadam and huge sheds.

In January 2017 the Council granted planning permission for warehouse development at Florida Farm North, (Site EA2) some 36.37 hectares of Greenbelt Land

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Development at this location would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58).

The problem isn't made any easier because the Council, in respect of the Florida Farm North development, has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic.

The developers of the site 2EA at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial.

A re-aligned junction at A580/Haydock Lane in respect of the development at 2EA was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and so generating more pollutants.

The additional traffic generated by the additional warehouses at 5EA and 6EA will place further pressure on the already heavily over burdened local highways network. Highways works have recently been undertaken at the junction of the A58/Millfield Lane/Tithe Barn Road but it doesn't appear that any provision has been made for this additional traffic.

The loss of approximately 217 acres of farmland in this small area North and South of the A580 could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities.

#### **7. Please set out modification(s) you consider are necessary**

It is too late for Site 2EA as the Council has already granted planning permission for these monstrous warehouses in an inappropriate location.

In respect of Sites 5EA and 6EA these should be removed from the list of sites to be removed from the Greenbelt.

#### **8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

#### **9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**



I wish to address the inquiry on behalf of the residents of this locality who have had their lives devastated by the inappropriate development at Site 2EA.

Response Date	3/11/2019 12:22:42 PM
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**Representor Details**

Web Reference Number	WF0246
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	--- ---

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing.

01

02

03



One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK

2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..  
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.



Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

**7. Please set out modification(s) you consider are necessary**

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
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RO1376



07 MAR 2019  
(For official use only)St Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MRS  
First Name: WENDY  
Last Name: PARR  
Organisation/company: \_\_\_\_\_

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_  
First name: \_\_\_\_\_  
Last Name: \_\_\_\_\_  
Organisation/company: \_\_\_\_\_  
Address: \_\_\_\_\_  
Postcode: \_\_\_\_\_  
Tel No: \_\_\_\_\_  
Mobile No: \_\_\_\_\_  
Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 6/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph/ diagram table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> THE PLAN IS BASED ON FLAWED METHODOLOGY
Effective?	<input checked="" type="checkbox"/> THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE PLAN DOES NOT SATISFY THE FOLLOWING</p> <ol style="list-style-type: none"> <li>1 THE REQUIREMENT FOR SUSTAINABLE DEVELOPMENT</li> <li>2 THE CRITERIA FOR SUSTAINABLE TRANSPORT AS THE PLAN PROMOTES INCREASED CAR DEPENDENCY/ REMOTE FROM TRANSPORT HUBS</li> <li>3 SUSTAINABLE HOUSING, TARGETS PROPOSED ARE BASED ON ASPIRATIONAL EMPLOYMENT GROWTH PREDICTIONS.</li> <li>4 EFFECTIVE LAND USE BY CONCENTRATING ON GREEN SPACE DEVELOPMENT OVER TOWN CENTRE DEVELOPMENT WITH HIGHER DENSITIES</li> <li>5 FOOD SECURITY B/ IGNORING AGRICULTURAL LAND QUALITY</li> </ol>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ECONOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON  
FLAWED HISTORICAL DATA THAT DOES NOT JUSTIFY THE ASPIRATIONAL  
TARGETS INCLUDED IN THE PLAN.

THE INCREASE IN TRAFFIC PROPOSED IN THE PLAN WILL HAVE  
A SIGNIFICANT IMPACT ON AIR QUALITY, NOISE, TRANQUILITY  
AND GENERAL HEALTH IT DOES NOT PROMOTE LESS  
VEHICLE DEPENDENCY WITH ITS PROPOSALS FOR EDGE  
OF TOWN DEVELOPMENTS.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1377



13 MAR 2019

Ref: LPSD

St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

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[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>WILLIAM</u>	First name: .....
Last Name: <u>PARR</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>10 ECCLESFIELD ROAD</u>	Address: .....
<u>ECCLESTON</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA10 5NB</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED]	Date: <u>7 MAR 2019</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

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Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
PLEASE SEE ATTACHED SHEET 1	



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PLEASE SEE ATTACHED SHEET 2

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

\_\_\_\_\_

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# SHEET 1

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safe-guarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.



## SHEET 2

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.



RO1378





St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MISS</i>	Title:
First Name: <i>Christina</i>	First name:
Last Name: <i>Parr</i>	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
[REDACTED]	Address:
[REDACTED]	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]

Date:

*22.3.19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1379



AK 8HS

① General

② LPA06

### Representor Details

Web Reference Number	WF0027
Type of Submission	Web submission
Full Name	Mrs Pauline Parr
Organisation	
Address	25 Howards Lane Eccleston St Helens WA10 5HX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)  
Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not positively prepared because it is based on flawed predictions of future growth. With a falling local population, the decline of St Helens town centre and the availability of brownfield sites elsewhere within the borough, it is not sound policy to sacrifice greenbelt and productive farmland while the town centre decays.

The local infrastructure has not been considered clearly. Local primary and secondary schools are already oversubscribed and there is nowhere to build more schools if this area is used for housing. Traffic issues are a major concern. The adjacent roads are residential and could not support an increase in traffic. Houghtons Lane is already quite treacherous for pedestrians. Pollution and noise would be dreadful in the new area of housing.

Not justified as 8HS is at present an area of Grade 1 & 2 agricultural land. As we face a possible exit from the EU, we need to retain as much farmland as we can in order to feed the population.

Not effective because building on 8HS is bringing houses to a town that is in dire need of regeneration to keep the population already here. The families who might move into these new homes would be unlikely to work in St Helens and unlikely to shop in St Helens. There are many houses for sale in the area. Building so many new homes without the need for them will make St Helens house-rich, but amenities-poor!

①

②



Not consistent with national policy because because there are brownfield sites available locally, which would be more suitable for housing development. National policy is that if brownfield sites are available, greenbelt should not be used for housing.

2

**7. Please set out modification(s) you consider are necessary**

8HS should be changed from 'safeguarded for development' and remain as green belt!

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date

3/13/2019 4:57:47 PM



RO1380



**Representor Details**

Web Reference Number	WF0299
Type of Submission	Web submission
Full Name	Dr Helen Parr
Organisation	Garswood Surgery
Address	Billinge Road Garswood Ashton-in Makerfield WN4 0XD
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	sustainability and strategic environmental assessment
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Garswood Surgery is situated adjacent to both proposed housing developments. These combined views are from the GP partners and staff of the surgery

- Garswood Surgery was not consulted regarding their capacity to accept a large influx of patient registrations
- Garswood Surgery is already at maximum capacity for the number of clinicians. We are not aware of any other GP practices that would have these houses in their practice boundaries – certainly no St Helens CCG practices
- Potential retirement of GP at neighbouring surgery has led to increase in numbers of patients requesting to register at Garswood Surgery
- There is a current, unresolved issue, with transfer of medical records from patients transferring from a neighbouring surgery to Garswood Surgery. This is compromising patients' safety of care.
- Safety of patient care would be further compromised if there was a large influx of patients (this includes those patients transferring from neighbouring surgery). This is likely to necessitate an application to close the list.



- St Helens borough has an ongoing, well recognised problem with the recruitment and retention of GP's and other clinical staff in primary care. Recruitment of new GP's for Garswood and the neighbouring surgery may not be possible – again, impacts on safety

**7. Please set out modification(s) you consider are necessary**

1. Primarily funding to cover large increase list size which would broadly need to cover;
  - Recruitment of additional clinical and administration staff
  - Training of staff
  - Interim salaries of these staff until list size increases
  - Increase rental cost in the building – more rooms will be required. Of note, we believe this to be substantial increase cost
2. Support for the neighbouring practice to enable them to maintain their current patient list to prevent further impact on our practice list.
3. CCG to reduce practice boundary for Garswood Surgery

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

As a Practice, we need have sound and sensible discussions regarding safe and effective measures that can potentially be put into place if any new housing developments were to go ahead.

Response Date	3/8/2019 3:24:50 PM
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RO1381





St Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A – Personal Details**  
**Part B – Your Representation(s)**.

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CHRISTOPHER	First name:
Last Name: PARRY	Last Name:
Organisation/company:	Organisation/company:
Address: 31 MEADOWCROFT SUPTON ST. HELENS	Address:
Postcode: WA9 3XD	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:
Signature: [REDACTED] Date: 12/05/19	

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## RETURN DETAILS

**Please return your completed form to us by no later than 5pm on Monday 13<sup>th</sup> May 2019 by:**

**post to:**

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or by hand delivery to:**

**Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or by e-mail to:**

**planningpolicy@sthelens.gov.uk**

*Please note we are unable to accept faxed copies of this form.*

## FURTHER INFORMATION

**If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:**

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

**The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.**

## DATA PROTECTION

**We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each  
separate comment/representation.**



RO1382



11 MAR 2019

17, Hester Drive

Eccleston

St. Helens

WA10 5EX

6 March 2019.

To Whom it may concern.

Re - Local Plan SHS - land South of A580 between  
Houghtons Lane - Cranstock Grove Windle.

I wish to register my objection to this land being  
removed from the Green Belt.

- ① The National Policy states that Green Belt should only  
be used as a last resort. St. Helens has many Brownfield  
sites which could be developed. These have not been  
properly surveyed in order to bring them back into use.  
Most of these are near the town centre which would rejuvenate  
it instead of going into decline.
- ② The Council's own figures on Housing requirements is much  
more than is needed. These houses will be owned by people  
who work well away from the centre and it will become  
a feeder town for other more prosperous areas.
- ③ With the prediction of food shortages this land is prime  
agricultural land which will continue to produce local food.  
This not only cuts down on transport costs but gives  
children the opportunity to walk to see crops growing and  
encourage them to do the same.
- ④ The plan has no suggestion as to how the hundreds of  
houses will cope with the transport around the area. This  
area is already congested a Windle Island and Houghtons Lane  
Springfield have 4 thousand more cars will make this area  
one of the most polluted and congested in the country. The  
impact on people's health will make this an unhealthy  
area.



⑤ There are no plans for amenities for the area. The schools are already full, there is very little medical provision in the area and no shops or social areas. People will have to be car dependent to live here.

Yours sincerely

(Ms)



Please will I be kept via post informed of further progress.



RO1383



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# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MAUREEN</u>	First name: _____
Last Name: <u>PHTE</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>79 HAMILTON ROAD</u> <u>SARSWOOD</u>	Address: _____
Postcode: <u>WV4 0LE</u>	Postcode: _____
Tel No: <span style="background-color: black; color: black;">[REDACTED]</span>	Tel No: _____
Mobile No: <u>-</u>	Mobile No: _____
Email: <u>-</u>	Email: _____

Signature: <span style="background-color: black; color: black;">[REDACTED]</span>	Date: <u>20.02.19</u>
---	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

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## **DATA PROTECTION**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP AOS	Paragraph/ diagram table SITE I HA		Policies Map SITE I HA <del>IIA</del>	SARSWOOD	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
1	Where are all the people coming from as St. Helens population is in decline?
2	Why destroy Green Belt Land when derelict & brown sites are available?
3	Why destroy Green Belt Land when doing so will destroy wild life?
4	We <del>already</del> are already short of school places, doctors surgeries bus routes & other services. Cars will be necessary because of lack of facilities, causing more congestion
5	Access will be inadequate. Council Tax Payers should not have to pay.

Please continue on a separate sheet if necessary



mergers, bus routes & other services. Cars will be necessary because of lack of facilities - causing more congestion

Access will be inadequate. Bounded Tax payers should not be liable for this. Developers must be responsible for this

MODIFICATIONS - Please delete this land from the proposed removal from the Greenbelt.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

What of the young people?  
No facilities have been mentioned for them as regarding facilities for sport, free time activities etc.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





St. Helens  
Council

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# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

001 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MAUREEN</u>	First name: _____
Last Name: <u>PATE</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>79 HAMILTON ROAD</u> <u>PARSWOOD</u>	Address: _____
Postcode: <u>WIGAN WN4 0UE</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20-02-19</u>
------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓



## **RETURN DETAILS**

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post to:

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St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <i>LP</i> <i>A 06</i>		Paragraph/ diagram table		Policies Map <i>SITE</i> <i>1 H 5</i>	<i>PARSWOOD</i>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
1	Where are all the people coming from as St Helens population is in decline?
2	Why destroy Green Belt Land when doing so will destroy wild life?
3	Why destroy Green Belt Land when develop 2 brown sites are available
4	We are already short of school places, doctors

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

See additional sheet

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



continuation

MAUREEN PATE

6. There is no mention of common ground with neighbouring authorities. This must be taken into account.

Box 7. MODIFICATIONS — Please Delete this land from the proposed removal from the Greenbelt.



RO1384





St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (I.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>ARTHUR</i>	First name:
Last Name: <i>PATTENDEN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>32 LOTUS GARDENS BOLD ST HELENS MERSEYSIDE</i>	Address:
Postcode: <i>WA9 4EB</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: <i>—</i>	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>30.4.2019</i>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1385





St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;  
**Part A – Personal Details**  
**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>M25</i>	Title:
First Name: <i>GERTRUD</i>	First name:
Last Name: <i>PATTENDEN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>32 LOTUS GARDENS BOLD ST HELENS MERSEYSIDE</i>	Address:
Postcode: <i>W44 4EB</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: <i>/</i>	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>30.4.2019</i>
-----------------------	------------------------

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**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1386



**Representor Details**

Web Reference Number	WF0166
Type of Submission	Web submission
Full Name	Mrs Suzanne Pattenden
Organisation	
Address	12 The Pastures St Helens WA9 4ZB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Effective

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

My view is in line with and the same as that of Bold and Clock Face Action Group

**7. Please set out modification(s) you consider are necessary**

My view is in line with and the same as that of Bold and Clock Face Action Group

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 7:33:54 PM
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RO1387





St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>BARBARA</i>	First name:
Last Name: <i>PATTERSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>46 CRAWFORD ST CLOCK FACE, ST. HELENS MERSEYSIDE</i>	Address:
Postcode: <i>WA9 4XH</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>11/3/20</i>
--	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes ☐ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or by e-mail to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



RO1388





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts:

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>NR</i>	Title:
First Name: <i>RAYMOND</i>	First name:
Last Name: <i>PATTERSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>46. CRAWFORD ST CLOCK FACE ST. HELENS MERSEYSIDE</i>	Address:
Postcode: <i>WA14 4XH</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>11/3/20.</i>
--	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



RO1389



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JEAN</u>	First name: _____
Last Name: <u>PATTISON</u>	Last Name: _____
Organisation/company: <u>TUNSTALLS FARM</u>	Organisation/company: _____
Address: _____	Address: _____
Postcode: <u>WA94 9J</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>13 May 2019</u>
------------------	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p><b>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></b></p> <p><b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</b></p>



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1390





St. Helens  
Council

① - LPA05  
② - LPA06

③ Statement of Common Ground  
516

PFO469

12 MAR 2019

Ref: LPSD

(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: .....
First Name: <u>Florence</u>	First name: .....
Last Name: <u>Warrington Pearce</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>4 Fernlea Grove</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0RF</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: <u>5/3/19</u>
-----------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

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## **DATA PROTECTION**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHA LPA 5		Module					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Release of greenbelt will cause significant harm to the purpose of greenbelt</p>	



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed  
removed from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHS		LP A06	Billiger				
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
Urban sprawl.	
Does not encourage regular or deliberate	
No statement of economic growth	
with other concerns.	

Please continue on a separate sheet if necessary



⑦ Delete low four proposed  
remove x gear belt



RO1391





St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JAMES</u>	First name: _____
Last Name: <u>PEARSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>57 Birch Grove</u> <u>Adyton in Matherfield</u>	Address: _____
Postcode: <u>WN4 0BX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <b>L P A O 5</b>	<i>site</i> <b>1 H A</b>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>- Not justified - the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1961. Where are all the extra people coming from?</p> <p>- One of the purposes of the green belts is to assist in urban regeneration by encouraging the recycling of derelict &amp; other urban land. Using greenbelt fails to encourage this.</p> <p>- the release of greenbelt will cause significant harm to the purposes of the greenbelt.</p> <p>- Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus route &amp; other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>- The access to the site on either Billinge Rd or Garwood Rd would be inadequate. Any necessary highway works must be funded by the developer &amp; not the Council tax payers.</p> <p>- There is no statement of common ground with neighbouring authorities.</p>



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>James</u>	First name: _____
Last Name: <u>Pearson</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>57 Birch Grove</u> <u>Ashton in Makerfield</u>	Address: _____
Postcode: <u>WN4 0QX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/03/19</u>
------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>



## **RETURN DETAILS**

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post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

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If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy L P A O 6	Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>- Not justified - the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?</p> <p>- One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict &amp; other urban land. Using Greenbelt fails to encourage this</p> <p>- The release of Greenbelt will cause significant harm to the purposes of the Greenbelt</p> <p>- Housing in this area not sustainable because of the lack of school places, doctors surgeries, bus routes &amp; other services. The use of cars is being encouraged because of the lack of facilities</p> <p>- there is no statement of common ground with neighbouring authorities</p>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green belt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1392



Ref: LPSD

(For official use only)

St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MARK</u>	First name: _____
Last Name: <u>PEERS</u>	Last Name: _____
Organisation/company: <u>FLT DRIVER</u>	Organisation/company: _____
Address: <u>98 TAUNTON AVE</u> <u>SUTTON LEACH</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4NY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>17-4-19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1393





St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ANN	First name:
Last Name: PENKETH	Last Name:
Organisation/company:	Organisation/company:
Address: 120 CARTONS LANE	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

22 3 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1394





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ALAN	First name:
Last Name: PENNINGTON	Last Name:
Organisation/company:	Organisation/company:
Address: 72 THE PASTURES NEW BOND	Address:
Postcode: WA9 4ZB	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 19/4/2019
-----------------------	-----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1395





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>DAWN</i>	First name:
Last Name: <i>PENNINGTON</i>	Last Name:
Organisation/company: <i>—</i>	Organisation/company:
Address: <i>72 THE PASTURES BOLD ST HELENS</i>	Address:
Postcode: <i>WA9 4ZB</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

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RO1396





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019  
(For official use only)

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: GERALDINE

Last Name: PELOW

Organisation/company: \_\_\_\_\_

Address: 71 SPRINGFIELD PARK

HAYDOCK

ST. HELENS

Postcode: WA11 0XP

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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## RETURN DETAILS

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St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy LPA 05 SHA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- NOT JUSTIFIED - COUNCIL SHOULD HAVE STRICT PROOF OF ITS POPULATION ESTIMATES, THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?
- ONE OF THE PURPOSES OF GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS.
- THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF THE GREENBELT
- HOUSING IN THE AREA IS NOT SUSTAINABLE BECAUSE OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF LACK OF FACILITIES.
- THE ACCESS TO THE SITE IS INADEQUATE, A LEFT IN/OUT FROM A530 IS NOT SAFE AND THE PROPOSAL FOR A JUNCTION AT LIVERPOOL ROAD + VICARAGE ROAD WOULD ADD ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRESSED HIGHWAYS SYSTEM. THERE WOULD BE PROBLEMS OF RAT RUNNING THROUGH PROPOSED DEVELOPMENTS MAKING ROADS WORSE THAN THEY ARE NOW.
- THERE ARE FLOODING PROBLEMS AT THIS SITE AS IT IS. THIS PROPOSED BUILD WOULD PUT FURTHER PRESSURE ON CLIPSELEI BRAC.
- THERE IS NO STATEMENT OF COMMON GROUND. ] 2



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED  
REMOVAL OF THE GREEN BELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LP104	2 EN SEA 6 EN	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				2 EN SEA 6 EN					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	DONT KNOW	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
<p>RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF GREENBELT + WILDLIFE. ] 3</p>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED  
REMOVAL OF THE GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
----	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE COUNCIL HAS

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1397





Site 1HS - Frank Phillips Representation Letter 01 03 19 - Land South of Leyland Green Road, north of Billinge Road and East of Garswood Road

Jill Ashley

to:

'planningpolicy@sthelens.gov.uk'

06/03/2019 13:46

E20019

1HS

LPA06

1 Attachment



F Phillips Representation Ltr 01 03 19 Site 1HS.pdf

Dear Sirs

Please find attached representation letter from myself which details my concerns in respect of the above site (1HS – land south of Leyland Green Road, north of Billinge Road and East of Garswood Road) which is being proposed.

If you wish to discuss further please do not hesitate to get in touch.

I would appreciate if you could confirm safe receipt of my letter.

Regards.

Frank Phillips

67 Leyland Green Road, Ashton in Makerfield, Nr Wigan WN4 0QU



67 Leyland Green Road  
Ashton in Makerfield  
Nr Wigan  
WN4 0QU

IHS  
① IPA06

E10019

1<sup>st</sup> March 2019

To Whom It May Concern  
Local Plan  
St Helens Council  
Town Hall, Victoria Square  
St Helens  
Merseyside  
WA10 1HP

Dear Sir or Madam

① [St Helens Borough Local Plan: Submission Draft – Site 1HS – Land South of Leyland Green Road, north of Billinge Road and east of Garswood Road, Garswood  
Town and Country Planning (Local Planning) (England) Regulations 2012

I write in respect of proposed developments as above and detail my concerns below:

- ①
1. The effect on the infrastructure of this area. We are already experiencing traffic delays at peak periods in this area as many commuters are now using the side roads to avoid hold-ups on the motorways with long delays at Ashton Cross in spite of recent road improvements.
  2. There is also the effect it would have on schools/welfare in this area?
  3. The land marked for development is prime agriculture land but is effected by shallow mine workings, collapses have taken place frequently.
  4. A large water main and gas main crosses the land in two separate places. Would this not somewhat restrict the development?
  5. There is also the effect on wild life as together with normal wildlife we have lapwings and partridges which return annually to nest here. Bats have made their home in the two barns and the derelict building on Leyland Green Road for a long time now.
  6. The land slopes towards the properties on Leyland Green Road and it would mean that no. 62, 65 and 67 would be seriously overlooked unless some serious consideration is not given to this. May be perhaps a landscaped area could be considered?
  7. No. 67 Leyland Green Road has a triangle rear back garden and south facing main rooms. If an area of land were made available for purchase to square the garden up this would help?

In conclusion, rather than develop large areas of land would it not be more sensible to develop smaller areas spread around or it seems a lot of brown field sites are being left undeveloped.

If you wish to discuss further please do not hesitate to get in touch.

Your faithfully

Frank Phillips



RO1398





St.Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

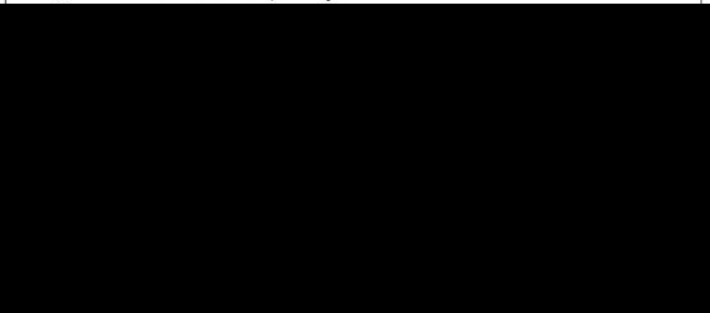
This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID	First name:
Last Name: PHILLIPS	Last Name:
Organisation/company: N/A	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature

Date:

1-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



### RETURN DETAILS

Please return your completed form to us by no later than **5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:00pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Please note we are unable to accept faxed copies of this form.

## FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
Telephone: 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.



**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Don't Know	Don't Know
Sound?	No —	No X
Complies with the Duty to Cooperate	No	No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments



I vehemently object to this site being removed from protection as designated, Green belt. From the late 1800's, the site was the farm and grounds, that supplied crops and vegetables, for the former Rainhill Mental Hospital. In the mid 1990's work, began, to transform the site into a golf club, an invaluable amenity, providing sport, social and well being facilities, in addition to employing over 30 people.

However, a financial opportunity was seen, by the owners of the golf club, to sell the site at a considerable profit, to a House Building Conglomerate, for housing development. You will read many objections, but I want to mention, monetary greed. Monetary greed of the golf club owner; the greed of the builder developer, by building high priced properties; the greed of the local authority, wanting to increase council revenues, because of high band ratings imposed on expensive properties.

I quote:

*"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

*Government policy encourages the use of brownfield land. On protecting the Green Belt, it urges local authorities, to maximise the use of suitable brownfield sites **before considering changes to Green Belt boundaries** and sets out the conditions that must be fulfilled for "exceptional circumstances" to exist, to justify such changes.*

*The Housing White Paper, published in February 2017, reiterated the Government's commitment to the Green Belt. It also emphasised that authorities should amend Green Belt boundaries only when they could demonstrate that they had examined fully all other reasonable options for meeting their identified development requirements".*

**I do not believe that there are any exceptional circumstances, to justify this site being removed from protection as Green Belt.**

Removing the land from Green Belt, and thereby enabling housing development will:

1. Lead to urban sprawl and combine two existing urban areas into one.
2. Lead to increasing traffic and air pollution.
3. Lead to Impact on already overcrowded Schools, Hospitals, GP and Dental surgeries, that are already suffering from insufficient staffing levels.

**Solving the housing challenge takes more than money. Or should that be making money. The local authority, should focus on exiting urban areas, create affordable first time buyer housing, and protect our green belt, not seek to build on what little green belt land, we have in this area.**

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)**

**The council should not consider removing this land from green belt to place in safeguarded**

Please continue on a separate sheet if necessary



**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination

X

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.



RO1399





St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

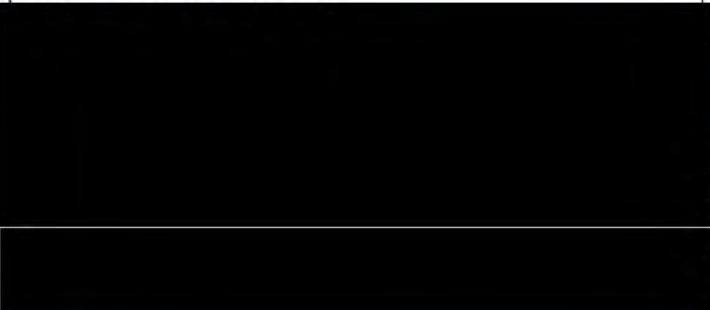
This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>Nicola</u>	First name:
Last Name: <u>PHILLIPS</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

3/5/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1400



18 Frenchfields Crescent

Bold

St Helens

Merseyside

WA9 4FZ

Dear Sir / Madam,

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

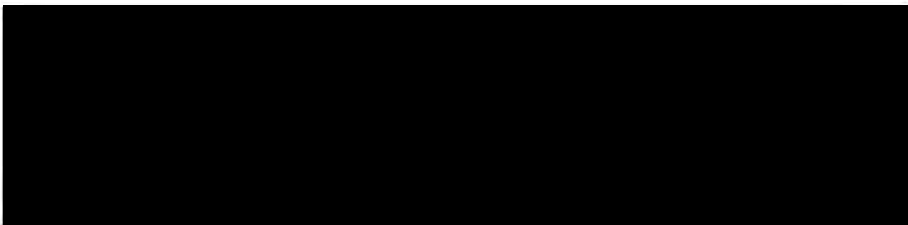
My rationale is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides countryside to the people. It has a huge environmental value. In the face of climate change it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015. Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to many of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA **2988 Houses** and LPSD 5HA **569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,



26 FEB 2019